

# **EXHIBIT**

# **G**

DEPOSITION OF  
KOHCHISE JACKSON  
JACKSON V. CORIZON HEALTH, INC.  
TAKEN ON  
MARCH 22, 2021



PHONE 855.525.3860 | 323.938.8750

Deposition of  
KOHCHISE JACKSON

JACKSON V. CORIZON HEALTH, INC.  
March 22, 2021

<p>1 UNITED STATES DISTRICT COURT 2 FOR THE EASTERN DISTRICT OF MICHIGAN 3 SOUTHERN DIVISION</p> <p>4 KOHCHISE JACKSON, ) 5 ) 6 Plaintiff, ) 7 ) 8 vs. ) Case No. 2:19-CV-13382 9 ) Hon. Terrence G. Berg 10 CORIZON HEALTH, Inc., ) MJ Patricia T. Morris 11 a Delaware corporation, ) 12 PRIME HEALTHCARE SERVICES - ) 13 PORT HURON, LLC, a Delaware ) 14 limited liability company, ) 15 KEITH PAPENDICK, COLLEEN MARIE ) 16 SPENCER, and DAVIS A. KRAUS*, ) *Dismissed 17 ) (ECF No. 32, PageID.630) 18 Defendants. ) 19 ) 20 ) 21 ) 22 ) 23 ) 24 ) 25 )</p> <p>12 The Video Deposition of KOHCHISE JACKSON taken by the 13 Defendants Prime Healthcare Services - Port Huron, LLC and 14 Colleen Marie Spencer, pursuant to Notice, before Elizabeth 15 A. Tubbert, RPR, (CSR-4248), a Notary Public within and for 16 the County of Oakland, (acting in Washtenaw County), State of 17 Michigan, at 214 South Main Street, Suite 200, Michigan, on 18 Monday, March 22, 2021.</p> <p>24 JOB No. 21-97861 25 (Appearances listed on page 2.)</p>	<p>Page 3</p> <p>1 I N D E X 2 WITNESS EXAMINER PAGE 3 KOHCHISE JACKSON WILLIS 5 4 SCARBER 49 5 CROSS 174 6 SCARBER 180 7 WILLIS 207 8 SCARBER 224 9 CROSS 244 10 SCARBER 247 11 WILLIS 248 12 SCARBER 255</p> <p>17 EXHIBIT NO. PAGE 18 (None marked.) 19 20 21 22 23 24 25</p>
<p>Page 2</p> <p>1 APPEARANCES: 2 MARGOLIS, GALLAGHER &amp; CROSS 3 BY: IAN T. CROSS, Esq. 4 214 South Main Street, Suite 200 5 Ann Arbor, Michigan 48104 6 (734) 994-9590 7 Ian@lawinannarbor.com</p> <p>8 Appearing on behalf of the Plaintiff</p> <p>9 CORBET, SHAW, ESSAD &amp; BONASSO, PLLC 10 BY: DANIEL R. CORBET, Esq. 11 KENNETH A. WILLIS, Esq. 12 30500 Van Dyke Avenue, Suite 500 13 Warren, Michigan 48093 14 (313) 964-6300 15 Daniel.Corbet@cseb-law.com 16 Kenneth.Willis@cseb-law.com</p> <p>17 Appearing via Zoom on behalf of Defendants 18 Prime Healthcare Services - Port Huron, LLC and 19 Colleen Marie Spencer 20 CHAPMAN LAW GROUP 21 BY: DEVLIN K. SCARBER, Esq. 22 1441 West Long Lake Road, Suite 310 23 Troy, Michigan 48098 24 (248) 644-6326 25 dscarber@chapmanlawgroup.com</p> <p>26 Appearing on behalf of Defendant Corizon Health, 27 Inc.</p> <p>28 Also Present: Colleen Spencer, via Zoom 29 30 Nicholas Houslander, Videographer</p>	<p>Page 4</p> <p>1 Ann Arbor, Michigan 2 Monday, March 22, 2021 3 At or about 11:14 a.m. 4 - - - 5 VIDEOGRAPHER: We are on the record. 6 This is the video-recorded deposition of Kohchise 7 Jackson taking place on March 22, 2021. The time is 8 now 10:14 (sic) a.m. My name is Nicholas Houslander, 9 video technician. This deposition is taking place at 10 214 South Main Street in Ann Arbor, Michigan 48104. 11 This is the case of Kohchise Jackson 12 versus Corizon Health, Incorporated, Prime Healthcare 13 Services - Port Huron LLC, Keith Papendick, and 14 Colleen Marie Spencer, Case No. 2:19-cv-13382 in the 15 United States District Court for the Eastern District 16 of Michigan, Southern Division. 17 Could the attorneys please briefly 18 identify themselves for the record? 19 MR. WILLIS: This is Kenneth Willis on 20 behalf of Defendants Lake Huron Medical Center and 21 Colleen Spencer. Attorney Dan Corbet and Colleen 22 Spencer are also attending via Zoom -- or viewing in 23 via Zoom. 24 MR. SCARBER: Attorney Devlin Scarber 25 appearing on behalf of the Corizon defendants, Corizon</p>

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1 Health, as well as Dr. Keith Papendick.	1 A I don't have any ID with me.
2 MR. CROSS: Ian Cross appearing on behalf	2 Q I understand that. But do you possess, like, a
3 of the plaintiff Kohchise Jackson.	3 driver's license or a state ID card or a passport,
4 VIDEOGRAPHER: Could the court reporter	4 anything like that?
5 please swear in the witness?	5 A Yeah.
6 - - -	6 Q Which of those do you possess?
7 KOHCHISE JACKSON,	7 A The -- I possess the prison -- what I got from the
8 a Plaintiff herein, having been duly sworn by the	8 prison.
9 Reporter/Notary Public, testified as follows:	9 Q Is that a prison identification card?
10 - - -	10 A Yes.
11 VIDEOGRAPHER: You may begin.	11 Q Is that current? You're no longer in prison; correct?
12 - - -	12 A No.
13 EXAMINATION	13 Q So just to clarify, you don't possess a passport;
14 BY MR. WILLIS:	14 correct?
15 Q Sir, do you have any government identification?	15 A No.
16 A Not on me, on person. No, sir.	16 Q You don't possess a driver's license?
17 Q You don't have ID? Any type of ID?	17 A No.
18 A Not on me.	18 Q You don't possess a state ID card?
19 Q For identification purposes the guidelines from the	19 A No. I -- no. I'm having trouble right now. I'm in
20 state allow a brief unmasking for identification	20 the process of getting a new state ID. Because, you
21 purposes. Can you remove your mask briefly for the	21 know, by me going to the police and everything like
22 camera?	22 that, I need my birth certificate, and somehow it got
23 A Yes, sir.	23 misplaced. So I've been having trouble, but I'm in
24 Q All right. Thank you. Can you -- strike that.	24 the process of that now.
25 MR. WILLIS: Let the record reflect this	25 Q I see. I see. How long have you been trying to do
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1 is the deposition of Kohchise Jackson taken pursuant	1 that?
2 to Notice and agreement of counsel.	2 A Actually, my attorney have taken (sic) me to the
3 BY MR. WILLIS:	3 Secretary of State and it's been a while now. Yeah.
4 Q Can you state your complete name for the record,	4 Q What's your date of birth, sir?
5 please, sir?	5 A 2/5/82.
6 A I'm Kohchise Marcelle Angelo Jackson.	6 Q And where were you born?
7 Q Have you ever been known by any other names?	7 A Detroit Henry Ford Hospital.
8 A No.	8 Q Just to close this loop on the ID, when was the last
9 Q Have you ever used any aliases?	9 time that you possessed either a Michigan driver's
10 A Yes, I've used an alias before.	10 license or a Michigan state identification?
11 Q When have you done that and what alias did you use?	11 A It had to be before I went to prison.
12 A I used Omari Akil Jackson when -- I used that as an	12 Q Which time? Have you been to prison more than one
13 alias with the police.	13 time?
14 Q Any other aliases that you've used?	14 A No, sir. No, sir. That was my only time in prison.
15 A No, sir.	15 Q That was 2017?
16 Q How long ago did you use that name as an alias with	16 A Yeah. I had -- my ID, had it for a long time.
17 the police?	17 Q Was that the driver's license or the state ID?
18 A Can't remember. It was before I went to prison. All	18 A It was actually a license but my license had been
19 that was before I went to prison. It was, like -- had	19 suspended.
20 to be 15 years, 12 years, up in there. Something like	20 Q When was your license suspended?
21 that.	21 A Can't remember. Had to be some years now. I don't
22 Q What -- you said you didn't bring any ID with you.	22 want to tell you a specific date.
23 What identification do you have --	23 Q Was that before you went into the --
24 A I don't --	24 A Prison, yes.
25 Q -- that's current?	25 Q -- St. Clair County Jail in 2016?

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<p>1 A Yes, sir. Yes, sir.</p> <p>2 Q So I assume you haven't driven a vehicle since then?</p> <p>3 A No, sir. I haven't driven a vehicle since my license</p> <p>4 was suspended.</p> <p>5 Q Where do you currently live, sir?</p> <p>6 A 17902 Maine Street, sir. That's in Detroit, Michigan.</p> <p>7 Q Is that Maine like the state?</p> <p>8 A M-A-I-N-E.</p> <p>9 Q Okay. What are the major crossroads?</p> <p>10 A Nevada.</p> <p>11 Q Nevada and what? What's the next --</p> <p>12 A Joseph Campau.</p> <p>13 Q How long have you lived at 17920 Maine Street in</p> <p>14 Detroit?</p> <p>15 A Since May of 2019.</p> <p>16 Q That's when you were discharged from the Department of</p> <p>17 Corrections?</p> <p>18 A Yes, sir.</p> <p>19 Q Now, according to the records, you came into the St.</p> <p>20 Clair County Jail on May 17, 2016. Is that correct?</p> <p>21 A Correct.</p> <p>22 Q Where did you live prior to that?</p> <p>23 A You said where did I live prior to where? What?</p> <p>24 Q Where did you live before you went into the St. Clair</p> <p>25 County Jail in May of 2016?</p>	<p>1 friend of mine. We call each other brothers -- out in</p> <p>2 Port Huron.</p> <p>3 Q What was your good friend's name that you referred to</p> <p>4 as a brother that lived in Port Huron?</p> <p>5 A Deon Johnson.</p> <p>6 Q Does Deon Johnson still live in Port Huron?</p> <p>7 A I don't think so.</p> <p>8 Q Do you know where he lives?</p> <p>9 A Yes, I do but I don't know the address.</p> <p>10 Q What city?</p> <p>11 A Detroit.</p> <p>12 Q What was your grandmother's address?</p> <p>13 A I believe 3228 Vermont. Don't quote me.</p> <p>14 Q That was the Vermont Street that you told us before?</p> <p>15 A Yes, sir. I believe. 3228, yep.</p> <p>16 Q Does Deon Johnson have any aliases that he goes by?</p> <p>17 A Not that I know of. I call him Deon.</p> <p>18 Q So when you lived on Chalfonte and West Grand</p> <p>19 Boulevard, who did you live with there?</p> <p>20 A Grandmother.</p> <p>21 Q I thought she was on Vermont. Or did she move?</p> <p>22 A She moved. She stayed on West Grand Boulevard at one</p> <p>23 point in time. She moved to Vermont. But she was</p> <p>24 originally on Chalfonte.</p> <p>25 Q Is your grandmother still living?</p>
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<p>1 A My last known address where I lived at -- at the time</p> <p>2 I was, like, homeless, in between addresses. But my</p> <p>3 last known address was 16031 Chalfonte. No, actually,</p> <p>4 it was West Grand Boulevard. But I was in between</p> <p>5 homes at the time -- before I went to prison.</p> <p>6 Q Just to clarify, before you went into the county jail</p> <p>7 in May of 2016 you were homeless?</p> <p>8 A Uh-huh.</p> <p>9 Q Okay. Where were you staying during that time? Were</p> <p>10 you staying in the Port Huron area?</p> <p>11 A I was living sometimes in Port Huron and sometimes in</p> <p>12 Detroit.</p> <p>13 Q So you mentioned two addresses. You mentioned 16031</p> <p>14 Chalfonte and West Grand Boulevard.</p> <p>15 A I was also staying at -- I was also living on Vermont.</p> <p>16 Vermont.</p> <p>17 Q On Vermont? Were all of these in Detroit, Chalfonte,</p> <p>18 West Grand and Vermont?</p> <p>19 A Yes, sir. Yes, sir.</p> <p>20 Q When did you become homeless? In 2016 or was it</p> <p>21 before 2016?</p> <p>22 A Right around that time. 2016 I really -- I was</p> <p>23 staying -- you know, like, I would live with my</p> <p>24 grandmother but I wouldn't stay there all the time.</p> <p>25 Sometimes I would stay with my brother -- well, a good</p>	<p>1 A Yes, sir. She lives on Vermont.</p> <p>2 Q And she still lives on --</p> <p>3 A Yes, sir.</p> <p>4 Q And she lives on Maine. Are you living with your</p> <p>5 grandmother currently?</p> <p>6 A No. I'm living with my older sister, Fatima Jackson.</p> <p>7 Q Why was your driver's license suspended?</p> <p>8 A No ops on person. I had a driver's license but I</p> <p>9 forgot them at home. And no headlights. That's how</p> <p>10 they pulled me over. So I forgot to turn my</p> <p>11 headlights on and when they pulled me over I didn't</p> <p>12 have my ops on my person, so they suspended my</p> <p>13 license.</p> <p>14 Q And when was that?</p> <p>15 A In 2001 or -2, I believe.</p> <p>16 Q So between 2001 or 2002 up until May of 2016 when you</p> <p>17 went into jail you never tried to get a valid driver's</p> <p>18 license?</p> <p>19 A I'm not really a big driver, sir. I rather be a</p> <p>20 passenger. Like, driving is not my thing like that.</p> <p>21 You know? But I was able to pass the test. I just</p> <p>22 don't feel real comfortable driving.</p> <p>23 Q Have you ever been married?</p> <p>24 A No.</p> <p>25 Q Do you have any children?</p>

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<p>1 A Yes.</p> <p>2 Q What are their -- your children's names and their</p> <p>3 ages?</p> <p>4 A I just have one child.</p> <p>5 Q What's your child's name?</p> <p>6 A Cylus Anglan.</p> <p>7 Q Can you spell that? I didn't hear it very well.</p> <p>8 A Cylus Anglan.</p> <p>9 Q And how old is Cylus?</p> <p>10 A Six.</p> <p>11 Q I assume your child lives with the mother.</p> <p>12 A Yes. No. He's actually with the state. He's</p> <p>13 actually with the state.</p> <p>14 Q Do you have any type of custody arrangement for your</p> <p>15 child?</p> <p>16 A No, sir. Actually, I lost my custody. I went to</p> <p>17 court to try to get him and I lost it.</p> <p>18 Q When was that?</p> <p>19 A 2012, I believe. Two thousand and -- may have been</p> <p>20 '13. May have been '13.</p> <p>21 Q So that would have been right when Cylus was born?</p> <p>22 A It was -- no, it was after he was born. He was</p> <p>23 already, like, a year. So it had to have been '13.</p> <p>24 Q Well, you said Cylus was six.</p> <p>25 A Yeah.</p>	<p>1 A I've been to college, Henry Ford Community College.</p> <p>2 I've been to Michigan Barber College. I went to</p> <p>3 Washtenaw Community College.</p> <p>4 Q Where did you graduate from high school?</p> <p>5 A I didn't graduate from high school. I have my G.E.D.</p> <p>6 Q When did you get your G.E.D.?</p> <p>7 A I got my G.E.D. when I was 18.</p> <p>8 Q What was the institution that provided or that granted</p> <p>9 you the G.E.D.?</p> <p>10 A Washtenaw Community College.</p> <p>11 Q You mentioned that you attended college. What -- how</p> <p>12 many credits or what degrees did you earn?</p> <p>13 A I earned a diploma, credits in construction site</p> <p>14 safety. I was --</p> <p>15 Q Construction site safety?</p> <p>16 A Yes, sir.</p> <p>17 Q When was that?</p> <p>18 A 2001. Yep, 2001.</p> <p>19 Q Was that from Washtenaw Community College?</p> <p>20 A Yes, sir.</p> <p>21 Q Any other credits or degrees --</p> <p>22 A Yes, sir.</p> <p>23 Q -- or certificates?</p> <p>24 A I went to -- I have -- I believe it was 900 credits,</p> <p>25 maybe, in Michigan Barber College. I went to barber</p>
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<p>1 Q So it's already 2021. So that would be 2014 or 2015</p> <p>2 that he would have been born, if he's six years old.</p> <p>3 A No. He was born in 2012, so he's seven.</p> <p>4 Q Okay. Well, he would be eight, then, right --</p> <p>5 A Yeah.</p> <p>6 Q -- if he was born in 2012?</p> <p>7 A Yeah. But he's going on eight. His birthday hasn't</p> <p>8 came yet. He was born July 24th.</p> <p>9 Q July 24, 2013?</p> <p>10 A Uh-huh.</p> <p>11 Q Why did you lose custody?</p> <p>12 A I wasn't -- I had got out of jail after he was born</p> <p>13 and I didn't have a home for him to come to.</p> <p>14 Q Have you taken any steps to reestablish custody?</p> <p>15 A Yes, I have. I've got in contact with the mother, who</p> <p>16 is in contact with the parents, but basically it's</p> <p>17 nothing I can do at this time, because I lost my</p> <p>18 rights.</p> <p>19 Q Can you give me a thumbnail sketch of your education</p> <p>20 background? Where did you go to school and for how</p> <p>21 long?</p> <p>22 A As far as what? Like, what -- school for what?</p> <p>23 Q Sure. Did you -- did you --</p> <p>24 A I've been to college.</p> <p>25 Q -- graduate from high school?</p>	<p>1 school on Grand River and Joy Road for months. I also</p> <p>2 went to Henry Ford Community College. I signed up for</p> <p>3 an apprenticeship program for carpentry, because I</p> <p>4 like to work with my hands, you know. That's what</p> <p>5 I've been doing. I've been working with my hands.</p> <p>6 Construction and landscaping.</p> <p>7 Q Okay. Well, let's back up just a second. So you went</p> <p>8 to the Michigan Barber College; correct?</p> <p>9 A Yes, sir.</p> <p>10 Q Did you complete the program at Michigan Barber</p> <p>11 College?</p> <p>12 A No, sir. I changed fields. So I started working in</p> <p>13 construction. I started out in the haircut business</p> <p>14 and I figured, you know -- like, you know, I got into</p> <p>15 landscaping and I got into construction, so, you know.</p> <p>16 I figured that it really wasn't -- I liked to do it</p> <p>17 but it wasn't something I wanted to do for the rest of</p> <p>18 my life. So that's how that happened.</p> <p>19 Q When did you go to the Michigan Barber College?</p> <p>20 A 2001 and 2002.</p> <p>21 Q Have you worked as a barber?</p> <p>22 A Yes. As a -- in one of my buddies' shop, like, you</p> <p>23 know, just sweeping up, cutting a little hair, you</p> <p>24 know. I was kind of like an apprentice.</p> <p>25 Q And when was that?</p>



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<p style="text-align: right;">Page 17</p> <p>1 A 2004, 2005, 2003. Yeah. From, you know, off and on.  2 I met someone with a barber shop and he used to let me  3 come in.  4 Q So the barber work that -- your apprentice barber  5 work, that was never a full-time job?  6 A No. It was actually just learning. It wasn't a  7 full-time thing. Most of it was learning.  8 Q Were you paid for the work that you did?  9 A Yeah, they had, like -- when I was in school we would  10 cut hair on the floor and they allow people to give  11 us, like, little tips. And when I helped my buddy out  12 in the barber shop, he paid me a little cash.  13 Q And then you said you went to Henry Ford Community  14 College for a carpentry program?  15 A Yes, sir.  16 Q When was that?  17 A 2002.  18 Q Did you complete the program at Henry Ford?  19 A No, sir. I didn't complete, no, sir.  20 Q How far did you go in that program?  21 A Maybe, like, three, four months, because it was,  22 like -- I believe the program may have been a five- or  23 six-month program.  24 Q Why did you stop attending the carpentry program at  25 Henry Ford Community College?</p>	<p style="text-align: right;">Page 19</p> <p>1 myself and pay rent where I be staying.  2 Q What's the name -- you said Michael Washington?  3 A Yes, sir.  4 Q What's Mr. Washington's -- the name of his company?  5 A He's just basically like a home improvement guy. So,  6 you know.  7 Q Where is he based out of?  8 A Detroit.  9 Q How long did you work for Mr. Washington and his  10 construction business?  11 A Off and on for years. Since two thousand and -- I  12 believe two.  13 Q Was that a -- did you get paid in cash or did you get  14 your W-2s every year, that kind of thing?  15 A He just paid me in cash.  16 Q How about your landscaping jobs? Were those cash jobs  17 or did you pay taxes on those?  18 A Everything was cash. The things that I paid taxes on,  19 I'm pretty sure you have a record of them.  20 Q What jobs have you held where taxes were taken out of  21 your paycheck?  22 A Homeland, Dish Network. I worked for Gill Hill  23 Association. I worked for Georgian Bloomfield Nursing  24 Home.  25 Q Any others?</p>
<p style="text-align: right;">Page 18</p> <p>1 A I stopped attending the program because it was a  2 transportation problem with being -- it was kind of  3 hard for me to get out there, not having a driver's  4 license.  5 Q Did that coincide with your driver's license  6 suspension?  7 A No, I wouldn't think so, because with the ride I was  8 getting to school every day. His car broke down.  9 Q Any other formal education beyond your G.E.D., the  10 construction site safety program at Washtenaw,  11 Michigan Barber College or Henry Ford Community  12 College?  13 A No, sir, that I can remember.  14 Q That's it?  15 A Yep.  16 Q Where have you been employed since, say, 2002 when you  17 left the carpentry program?  18 A Since 2002? I've been doing, like I told you -- I cut  19 hair from -- a little bit. Cut grass. I do  20 landscaping. I'm into landscaping. I've been doing  21 that on and off for years. And construction, I was  22 working with a guy under -- you know, he was basically  23 like an apprentice, a master carpenter. His name is  24 Michael Washington, and he's been training me. So I  25 do a lot of work with him. You know? Just to support</p>	<p style="text-align: right;">Page 20</p> <p>1 A That's what I can think of right off the top, you  2 know? Like I said, most of my jobs have been with my  3 hands.  4 Q When was the last time you worked for Mr. Washington's  5 home improvement company?  6 A The other day.  7 Q So you've worked for Mr. Washington since you were  8 discharged from state prison?  9 A Yes, sir, and I also -- yes, sir. I've also been  10 doing landscaping.  11 Q Who do you work for for landscaping?  12 A Myself.  13 Q For yourself?  14 A Yeah. I find people who need jobs and do their snow,  15 do their grass. Yep.  16 Q And you've been doing that work since you got out of  17 prison, also?  18 A I just really pretty much started that. I was working  19 for Michael Washington since I -- when I got out.  20 Q Maybe we're not connecting. Have you worked in  21 landscaping since you got out of prison?  22 A Yes, off and on. I'm saying I really just started  23 doing that -- like, the landscaping by myself.  24 Q Right.  25 A Just, like, recently when it was snowing. But the</p>

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<p style="text-align: right;">Page 21</p> <p>1 work that I was doing when I got out of prison, I was</p> <p>2 working with Michael Washington mostly.</p> <p>3 Q Okay. When did you work for Dish Network?</p> <p>4 A I can't remember.</p> <p>5 Q How long ago was it? It was obviously before you went</p> <p>6 to prison; right?</p> <p>7 A Yes, before I went to prison.</p> <p>8 Q Where did you work for Dish Network? What region?</p> <p>9 What area?</p> <p>10 A Detroit. No. It was Livonia.</p> <p>11 Q How long did you work for Dish Network?</p> <p>12 A I can't remember. Had to be for some months. Can't</p> <p>13 remember right now. I can't tell you exactly the</p> <p>14 time. It was years ago.</p> <p>15 Q Was it -- did you work for Dish Network for more than</p> <p>16 a year?</p> <p>17 A No.</p> <p>18 Q Less than a year?</p> <p>19 A Yes. I believe it was somewhere around 90 days. Like</p> <p>20 that amount of time.</p> <p>21 Q And the nursing home, the Bloomfield nursing home --</p> <p>22 A Yeah.</p> <p>23 Q -- when did you work there?</p> <p>24 A In 2001.</p> <p>25 Q So you worked at the nursing home in 2001?</p>	<p style="text-align: right;">Page 23</p> <p>1 COURT REPORTER: I'm sorry. Felonious</p> <p>2 assault and --</p> <p>3 THE WITNESS: Illegal use of electronics</p> <p>4 or tampering with a telephone. Something like that.</p> <p>5 BY MR. WILLIS:</p> <p>6 Q And this was in St. Clair County; correct?</p> <p>7 A Correct.</p> <p>8 Q And that happened in 2016, which is what led you to go</p> <p>9 to the St. Clair County Jail; correct?</p> <p>10 A Correct.</p> <p>11 Q Have you had any other arrests besides the arrest for</p> <p>12 which you went to prison?</p> <p>13 A Have I had any other arrests? Yes.</p> <p>14 Q Have you ever been arrested before that? You</p> <p>15 mentioned that you were in jail before, but what was</p> <p>16 that for?</p> <p>17 A I've been to jail before.</p> <p>18 MR. CROSS: I'm going to object to the</p> <p>19 relevance of this line of questioning.</p> <p>20 MR. WILLIS: Okay.</p> <p>21 BY MR. WILLIS:</p> <p>22 Q I'll take an answer.</p> <p>23 A I've been in jail for breaking the law.</p> <p>24 Q Okay. What were you convicted of?</p> <p>25 A When are you speaking of?</p>
<p style="text-align: right;">Page 22</p> <p>1 A Yes, sir.</p> <p>2 Q And for how long?</p> <p>3 A About 90 days.</p> <p>4 Q Did you ever hold any jobs in Port Huron or St. Clair</p> <p>5 County?</p> <p>6 A Just cash jobs that I do.</p> <p>7 Q I'm sorry. What was it that you do?</p> <p>8 A Just, like, cash jobs. Like, you know, fixing</p> <p>9 something for people. You know, doing things that I</p> <p>10 know how to do. Home improvement. Snow. Shovel</p> <p>11 their snow. Cut their grass. You know, I do that</p> <p>12 type of work. So, yeah, I done did it.</p> <p>13 Q Was that when you were staying with your friend Deon?</p> <p>14 A Yeah.</p> <p>15 Q I assume you've never been in the military; correct?</p> <p>16 A No, sir. I've been in the Boy Scouts.</p> <p>17 Q Now, you testified you've been to prison on one</p> <p>18 occasion; correct?</p> <p>19 A Correct.</p> <p>20 Q And what was that for?</p> <p>21 A What was it for or -- like, what do you want to know?</p> <p>22 For breaking the law.</p> <p>23 Q What were you charged with?</p> <p>24 A I was charged with attempted unlawful imprisonment,</p> <p>25 felonious assault and --</p>	<p style="text-align: right;">Page 24</p> <p>1 Q At any point.</p> <p>2 A You want me to go through my arrest record with you?</p> <p>3 I mean, I'm trying to understand what are you asking.</p> <p>4 MR. CROSS: Just answer the question.</p> <p>5 BY MR. WILLIS:</p> <p>6 Q For the last ten years.</p> <p>7 A The last ten years?</p> <p>8 Q Yeah.</p> <p>9 A I had unlawful imprisonment, felonious assault,</p> <p>10 tampering with a telephone.</p> <p>11 MR. CROSS: You have to answer the</p> <p>12 question. So if he asked you about your previous</p> <p>13 arrests in the last ten years, say all of them.</p> <p>14 THE WITNESS: Okay.</p> <p>15 A That was the most recent.</p> <p>16 BY MR. WILLIS:</p> <p>17 Q Okay.</p> <p>18 A GBH.</p> <p>19 Q What's that?</p> <p>20 A Great bodily harm. That was the one before then, that</p> <p>21 one. May have been possession of marijuana.</p> <p>22 Possession of cocaine. Obstruction of justice, using</p> <p>23 an alias. That's it that I can remember. Possession,</p> <p>24 yeah.</p> <p>25 Q The obstruction of justice, that was because you used</p>



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<p style="text-align: right;">Page 25</p> <p>1 an alias for your name?</p> <p>2 A Yes, sir. I used the alias with the police for my</p> <p>3 name -- when they asked me my name.</p> <p>4 Q And these arrests, were they all in St. Clair County?</p> <p>5 A No.</p> <p>6 Q Where else have you been arrested?</p> <p>7 A Wayne County.</p> <p>8 Q Wayne County?</p> <p>9 A Uh-huh.</p> <p>10 Q Anywhere else?</p> <p>11 A That's it.</p> <p>12 Q Do you currently have a primary care physician, sir?</p> <p>13 A No, sir. Not currently.</p> <p>14 Q When was the last time you had a primary care doctor?</p> <p>15 A What do you mean?</p> <p>16 Q Sometimes people have a regular doctor that they see</p> <p>17 on an ongoing basis.</p> <p>18 A You asking me when was the last time I've been to the</p> <p>19 doctor?</p> <p>20 Q No, sir. The last time you had a regular doctor or a</p> <p>21 primary care doctor.</p> <p>22 A I was in a car accident not too long ago and I was</p> <p>23 going to the doctor. That's what you want to know?</p> <p>24 Q Okay. Well, let's talk about that. When were you in</p> <p>25 a car accident?</p>	<p style="text-align: right;">Page 27</p> <p>1 might want to follow up with your primary health care</p> <p>2 doctor." So I just saw the EMT on the site and I just</p> <p>3 went to the doctor that following week.</p> <p>4 Q How many times did you go to the doctor?</p> <p>5 A I can't remember exactly how many times but I went a</p> <p>6 couple of times.</p> <p>7 Q And that was at the Select Specialists office?</p> <p>8 A Yes, sir.</p> <p>9 Q How is your back doing now?</p> <p>10 A Still a little -- a little pain but I'm okay.</p> <p>11 Q Do you know if there was ever a lawsuit or any other</p> <p>12 sort of legal action taken as a result of that car</p> <p>13 accident?</p> <p>14 A Yes. I called them guys. Some people that I know</p> <p>15 that was with me, that was in the accident, I gave</p> <p>16 them (sic) attorney my name. So they contacted me or</p> <p>17 whatever and they wanted me to follow through with a</p> <p>18 lawsuit but I told them that I didn't want to. Every</p> <p>19 time they called me or whatever, I just never</p> <p>20 responded.</p> <p>21 Q So you never -- you're not a part of a lawsuit as a</p> <p>22 result of that car accident?</p> <p>23 A No, sir. I told the attorney myself personally that I</p> <p>24 did not want to be a part of any lawsuit.</p> <p>25 Q Well, while we're on that subject, other than the</p>
<p style="text-align: right;">Page 26</p> <p>1 A June -- no. Yeah, June of this year.</p> <p>2 Q June of 2020?</p> <p>3 A No. June of last year.</p> <p>4 Q So June of 2020?</p> <p>5 A June of '21. Yeah, June of 2020. Yes, sir.</p> <p>6 Q And where was that at?</p> <p>7 A I believe in Highland Park. I believe the accident</p> <p>8 happened in Highland Park.</p> <p>9 Q You were injured in that accident?</p> <p>10 A Yes. I was having back problems and my back was</p> <p>11 hurting, yeah.</p> <p>12 Q So you went to the doctor for your back problems?</p> <p>13 A Yes.</p> <p>14 Q Where was that?</p> <p>15 A Select Specialists.</p> <p>16 Q Where is the office?</p> <p>17 A Southfield.</p> <p>18 Q Did you go to the hospital immediately after the</p> <p>19 accident?</p> <p>20 A I saw the EMS -- due to corona, they told me that if</p> <p>21 you guys weren't really hurt, you might -- you know,</p> <p>22 they check me out in the ambulance, but they was,</p> <p>23 like, "Due to corona, you guys might -- you all going</p> <p>24 to be down there all night. If you all are not really</p> <p>25 hurting, like, really badly," then they said, "You</p>	<p style="text-align: right;">Page 28</p> <p>1 lawsuit for which you're giving a deposition today,</p> <p>2 have you ever been a part of any other lawsuits --</p> <p>3 A No, sir.</p> <p>4 Q -- or workers' compensation claims?</p> <p>5 A No, sir.</p> <p>6 Q All right. Getting back to your medical history,</p> <p>7 let's start since you got out of the state prison in</p> <p>8 May of 2019. Where have you had medical treatment</p> <p>9 since May 2019?</p> <p>10 A At Harper Hospital.</p> <p>11 Q And was that for your reversal surgery?</p> <p>12 A Yes, sir.</p> <p>13 Q Anywhere else?</p> <p>14 A I've had at Select Specialists, which I've told you.</p> <p>15 I also had -- been to the hospital in Port Huron and,</p> <p>16 yeah, that's it.</p> <p>17 Q Which hospital in Port Huron?</p> <p>18 A Was it Mercy or -- I always get those confused, Mercy</p> <p>19 or Port Huron Hospital. Either one. There's only</p> <p>20 two.</p> <p>21 Q Lake Huron Medical Center or McLaren Port Huron?</p> <p>22 A Either or one of them, sir. I can't remember exactly</p> <p>23 which one. One of them. I don't want to lie to you.</p> <p>24 Q What did you go to the hospital in Port Huron for?</p> <p>25 A I was shot. Actually --</p>

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<p style="text-align: right;">Page 29</p> <p>1 Q What led up to getting shot?</p> <p>2 A In 2012 someone robbed me at gunpoint. That's what</p> <p>3 the GBH was about, the great bodily harm. Someone</p> <p>4 robbed me at gunpoint and then at a festival they have</p> <p>5 at Port Huron, him and his friends jumped at me at the</p> <p>6 Boat Night and I ended up stabbing the guy. That</p> <p>7 happened in 2012. I went to jail for a year for</p> <p>8 stabbing the guy after they jumped on me. I did a</p> <p>9 year and I was released for the great bodily harm.</p> <p>10 Well, in 2016 -- well, in -- just now, when I went to</p> <p>11 the hospital, which is 2020 -- yeah, in 2020 the guy</p> <p>12 -- it was his cousin, the guy who I stabbed, shot me.</p> <p>13 Saw me and shot me at the gas station in Port Huron</p> <p>14 when I was up there visiting my brother. Well, my</p> <p>15 best friend. I call him my brother.</p> <p>16 Q When you were visiting Deon?</p> <p>17 A Yes.</p> <p>18 Q The year that you went -- that you spent in jail for</p> <p>19 stabbing somebody on Boat Night, was that in St. Clair</p> <p>20 County?</p> <p>21 A Yes, sir.</p> <p>22 Q So where were you shot?</p> <p>23 A In the legs. Both legs.</p> <p>24 Q And you went to McLaren Port Huron for that?</p> <p>25 A I'm not sure, sir. It was either Port Huron or Mercy.</p>	<p style="text-align: right;">Page 31</p> <p>1 Q How long were you in the hospital for?</p> <p>2 A Couple hours.</p> <p>3 Q So you didn't have any surgery or anything like that</p> <p>4 for the gunshot wounds?</p> <p>5 A No, sir.</p> <p>6 Q Did you have stitches, anything like that?</p> <p>7 A No, sir.</p> <p>8 Q What did it hit?</p> <p>9 A It just went through my legs, sir.</p> <p>10 Q So there's no retained bullet or anything?</p> <p>11 A No, sir, the bullet is still in my leg.</p> <p>12 Q It's still in your leg?</p> <p>13 A Yes, sir.</p> <p>14 Q Which leg?</p> <p>15 A Left leg.</p> <p>16 Q It looks like -- I've got some records -- it looks</p> <p>17 like you've been to the hospital multiple times for</p> <p>18 complaints of penile discharge, infections since you</p> <p>19 got out of prison. Anything else?</p> <p>20 A That's it.</p> <p>21 Q Okay. How about before you went into the St. Clair</p> <p>22 County Jail in May of 2016, where had you sought</p> <p>23 medical treatment?</p> <p>24 A McLaren and Mercy Hospital.</p> <p>25 Q Both in Port Huron?</p>
<p style="text-align: right;">Page 30</p> <p>1 It was either McLaren Port Huron or Mercy Hospital.</p> <p>2 One of the two. I was in a lot of shock so I can't</p> <p>3 remember.</p> <p>4 Q You said it happened at a gas station?</p> <p>5 A Uh-huh.</p> <p>6 Q Was that in Port Huron?</p> <p>7 A Uh-huh.</p> <p>8 Q That's a yes?</p> <p>9 A Yes, sir. Yes, sir.</p> <p>10 Q Sure. You are doing great, by the way. Sometimes</p> <p>11 I'll prompt you when people say "uh-huh" or "uh-uh."</p> <p>12 We need to have a clear record for the court reporter,</p> <p>13 so -- but you're doing a great job. So if I prompt</p> <p>14 you, I'm not trying to be rude or anything. I just</p> <p>15 want to get a clearer answer for the court reporter.</p> <p>16 A Thank you, sir.</p> <p>17 Q Was anybody charged in the shooting in 2020?</p> <p>18 A No, sir, because they couldn't find the guy and I</p> <p>19 don't know his name.</p> <p>20 Q But you knew he was somebody's cousin?</p> <p>21 A Yeah, that's what I assume because that's what he</p> <p>22 said -- he was the guy's cousin that I stabbed.</p> <p>23 Q Was that multiple shots or one shot that hit both</p> <p>24 legs?</p> <p>25 A One shot hit both legs.</p>	<p style="text-align: right;">Page 32</p> <p>1 A Yes, sir. I've been to -- I believe the hospital in</p> <p>2 Detroit before. Was it Receiving? Might have been</p> <p>3 Receiving Hospital.</p> <p>4 Q What was that for?</p> <p>5 A I had a broken leg before. I had a little -- maybe a</p> <p>6 possible STD before but that's it.</p> <p>7 Q Had you ever had surgery before you had surgery while</p> <p>8 you were in jail in St. Clair County?</p> <p>9 A No, sir.</p> <p>10 Q That was your first surgery you'd ever been in the</p> <p>11 hospital for?</p> <p>12 A Yes, sir.</p> <p>13 Q Okay. I want to ask you some questions about the time</p> <p>14 period when you were incarcerated in the St. Clair</p> <p>15 County Jail, and, again, that was -- that began on May</p> <p>16 17, 2016; correct?</p> <p>17 A Yes, sir.</p> <p>18 Q How many times were you sent outside of the St. Clair</p> <p>19 County Jail for the purpose of getting medical care?</p> <p>20 A Three times that I can recall.</p> <p>21 Q Would it sound right if it was six or more times?</p> <p>22 A That I was -- oh, okay. Are you talking about my</p> <p>23 follow-up appointments?</p> <p>24 Q Sure, yeah. Any time that you had to leave the St.</p> <p>25 Clair County Jail premises to leave to go somewhere</p>

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<p style="text-align: right;">Page 33</p> <p>1 for medical care.</p> <p>2 A Yes, I can't remember exactly how many times, sir.</p> <p>3 Q Do you recall that in October of 2016 you had to go to</p> <p>4 Lake Huron Medical Center for a renal ultrasound?</p> <p>5 A Uh-huh. Yes, sir.</p> <p>6 Q And then on December 6th you were sent to Lake Huron</p> <p>7 Medical Center for a CT scan and you ended up staying</p> <p>8 and having your surgery done; correct?</p> <p>9 A Yes, sir.</p> <p>10 Q And you went back to Lake Huron Medical Center on</p> <p>11 December 18, 2016 when your catheter was pulled out;</p> <p>12 correct?</p> <p>13 A Yes, sir. Not pulled out. You mean pulled out?</p> <p>14 Q The catheter came out somehow.</p> <p>15 A Yeah. You want to talk about that?</p> <p>16 Q Okay. Well, let me go through the list first and</p> <p>17 we'll go back to it.</p> <p>18 A Okay.</p> <p>19 Q And you saw Dr. Kansakar at her office on two</p> <p>20 occasions; once in December and once on January 10,</p> <p>21 2017. Correct?</p> <p>22 A Correct.</p> <p>23 Q And you also went to Lake Huron Medical Center for a</p> <p>24 retrograde cystogram on December 29, 2016; correct?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 35</p> <p>1 Could you explain to me in your own words what that</p> <p>2 surgery entailed?</p> <p>3 A What do you mean? They -- I was -- I had a fistula --</p> <p>4 a hole in between my bowels and my bladder was</p> <p>5 repaired and I had a permanent -- I mean, I had --</p> <p>6 supposed to have been a temporary bag placed on me.</p> <p>7 It was supposed to be temporary. From what I was told</p> <p>8 I was supposed to have a bag -- a stoma and a bag --</p> <p>9 colostomy bag placed on me for two months and it would</p> <p>10 come off. Yeah, that's the medical treatment. That's</p> <p>11 what I was told by --</p> <p>12 Q Who told you that?</p> <p>13 A Nurse Colleen. That was the understanding, the talk</p> <p>14 that I had with Dr. Kansakar and the people in the</p> <p>15 hospital.</p> <p>16 Q Okay. Well, let's go into that for a second. So</p> <p>17 there were people in the hospital. Dr. Kansakar and</p> <p>18 you said Nurse Colleen told you that you were supposed</p> <p>19 to have some sort of reversal done two months</p> <p>20 afterwards?</p> <p>21 A Yes.</p> <p>22 Q When did Dr. Kansakar tell you this?</p> <p>23 A During my -- during the time I was in the hospital.</p> <p>24 Q Right after your surgery?</p> <p>25 A No. Before the surgery.</p>
<p style="text-align: right;">Page 34</p> <p>1 Q Were there any other times that you had to leave the</p> <p>2 jail premises to go somewhere for medical care?</p> <p>3 A Not that I can recall. No. Just a couple years ago.</p> <p>4 Q So it was at least those six times?</p> <p>5 A Yes, sir.</p> <p>6 Q So on December 6, 2016 you went to Lake Huron Medical</p> <p>7 Center, and that's when you ended up being admitted</p> <p>8 and you had your colostomy surgery; correct?</p> <p>9 A Correct.</p> <p>10 Q Dr. Kansakar was your surgeon?</p> <p>11 A Correct.</p> <p>12 Q While you were in Lake Huron Medical Center for your</p> <p>13 surgery, you had St. Clair County Jail deputies</p> <p>14 stationed with you during that time; correct?</p> <p>15 A While I was where?</p> <p>16 Q When you were --</p> <p>17 A In the hospital?</p> <p>18 Q -- in the hospital for your surgery?</p> <p>19 A Yes, sir.</p> <p>20 Q Do you know who paid for your December 2016 colostomy</p> <p>21 surgery?</p> <p>22 A No, sir, I don't know.</p> <p>23 Q Have you ever seen any bills for that surgery?</p> <p>24 A No, sir.</p> <p>25 Q So in December you had the surgery with Dr. Kansakar.</p>	<p style="text-align: right;">Page 36</p> <p>1 Q Before the surgery. Okay. So she said that you could</p> <p>2 have it replaced even before she did the initial</p> <p>3 colostomy surgery; right? Is that what you're saying?</p> <p>4 A They were saying there was a plan to put a bag on me</p> <p>5 but it would be reversed. It wasn't permanent. And I</p> <p>6 asked her when --</p> <p>7 Q Was that Dr. Kansakar who told you that?</p> <p>8 A It was Dr. Kansakar who told me that and whoever else</p> <p>9 was in the hospital that I talked to. Let me think.</p> <p>10 Because there's, like, a nurse on-site. They talk to</p> <p>11 you before you -- you know, because you have to sign</p> <p>12 off to get the surgery and everything. They tell you</p> <p>13 everything that's going to happen before the surgery.</p> <p>14 I was told I would be placed with a temporary bag.</p> <p>15 Q Now, you didn't see Nurse Colleen at the hospital, did</p> <p>16 you?</p> <p>17 A Yes.</p> <p>18 Q You saw Nurse Colleen at Lake Huron Medical Center?</p> <p>19 A Yes, but I didn't see her until after the surgery.</p> <p>20 Q But you saw her physically at the hospital; is that</p> <p>21 what you're saying?</p> <p>22 A Yes, sir.</p> <p>23 Q And -- now, when you say Nurse Colleen, are you</p> <p>24 talking about the defendant nurse, Colleen Spencer?</p> <p>25 A Yes, sir.</p>

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<p style="text-align: right;">Page 37</p> <p>1 Q Well, what did you and Nurse Colleen discuss at Lake 2 Huron Medical Center following your December surgery? 3 A Just the facts, because she was the one who initially 4 came to me and told me after six months of me having 5 the fistula and getting diagnosed with urinal tract 6 syndrome -- because they thought I had a urinal tract 7 infection. That's what they told me. And I went to 8 the -- I kept going to medical for, like, almost five 9 or six months complaining about a urinal tract 10 infection but it was really my bowels going through my 11 bladder. So every time I would say that I, you know, 12 was having particles coming out of my penis, then they 13 would tell me I had a urinal tract infection. So 14 Nurse Colleen is the person who first came to me and 15 told me that she looked in the records and she feel 16 like I have a fistula and they going to take me to the 17 hospital to get me checked out. And this was six 18 months after I reported it -- particles coming out of 19 my penis and air bubbles coming out of my penis. You 20 know? And they give me -- I believe it was 21 amoxicillin. 22 Q So it was Nurse Colleen who made the arrangements for 23 you to go to the Lake Huron Medical Center for the 24 surgery? 25 A No. She was the one who came before me and told me I</p>	<p style="text-align: right;">Page 39</p> <p>1 A December 27th? 2 Q Right. 3 A Yes. Yes, sir. 4 Q What do you recall about that visit? 5 A Okay. On December 27th she just basically checked to 6 make sure -- she just basically checked to make sure 7 that, you know, I was healing properly, my colostomy 8 was functioning, I was going to the bathroom, and she 9 was just checking on, you know -- she was making the 10 reversal plans -- plans to -- for a reversal. So 11 that's what she was doing with me. Making the 12 reversal care and seeing how I was healing. That's 13 all she talked to me about in December. 14 Q Was your colostomy functioning properly? 15 A At the time, yes. Yes, it was. 16 Q All right. You mentioned that she was making reversal 17 plans. Do you know what plans those were? 18 A Yeah. See, she had -- from my knowledge she was just 19 -- she just told me, like, you know, that she planned 20 to do the reversal surgery February 9th and that was 21 the day she prescribed to do it. But when I went to 22 her the next time, she told me that she was all ready 23 to go for the surgery. She had did her parts and she 24 was all ready and she was just having problems with 25 getting in touch with the jail because no one would</p>
<p style="text-align: right;">Page 38</p> <p>1 was going. But I'm not sure if she is the one who 2 made the arrangements but I know she is the one who 3 talked to me and told me I was going. Because she is 4 the head nurse at the jail. 5 Q Now, getting back to -- how many times did you talk to 6 Nurse Colleen in the hospital at Lake Huron Medical 7 Center? 8 A Just one time. She came to the hospital and came in 9 the room after I had the surgery. 10 Q So it looks like you were in the hospital for about 11 eight days. Does that sound right? 12 A Right. 13 Q And after that you went back to the St. Clair County 14 Jail; correct? 15 A Correct. 16 Q Before you left the hospital you were trained on how 17 to apply the colostomy bag and treat the urostomy; 18 correct? 19 A I saw a wound care specialist for that. 20 Q And that was at the hospital before you went to the -- 21 back to the jail; right? 22 A Yes, sir. 23 Q So it looks like you followed up with Dr. Kansakar at 24 her office on December 27, 2016, the first time 25 postoperatively. Do you recall that?</p>	<p style="text-align: right;">Page 40</p> <p>1 respond back to her about the payment program, how 2 they were going to pay for it. She said that she 3 would even sign off on her part to do it, because she 4 felt it was necessary to be done, but the only thing 5 that was stopping my reversal was the people at the 6 jail contacting her about the payment. That's what I 7 talked to her about. 8 MR. SCARBER: I'll just place an 9 objection as to hearsay and foundation. 10 MR. WILLIS: When somebody else in the 11 room speaks we can't hear you. I don't know if you 12 don't have a microphone. Could you speak up, please? 13 MR. SCARBER: Oh, I'm sorry. 14 VIDEOGRAPHER: He's just getting room 15 audio from this laptop, so... 16 MR. SCARBER: I'm sorry. This is Devlin 17 Scarber. I objected to hearsay and foundation on the 18 last answer and question. 19 Can you hear me? 20 MR. WILLIS: Yes. Thank you very much. 21 MR. SCARBER: Okay. 22 THE WITNESS: His camera went off. I 23 mean, I can't see him. 24 VIDEOGRAPHER: Did you mean to turn your 25 camera off?</p>



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<p style="text-align: right;">Page 41</p> <p>1 MR. CORBET: He doesn't need it on, I</p> <p>2 guess.</p> <p>3 MR. WILLIS: You don't want it on.</p> <p>4 You know what? Can I take a quick break</p> <p>5 here if that's all right with you?</p> <p>6 MR. CROSS: Sure. No problem.</p> <p>7 VIDEOGRAPHER: We are going off the</p> <p>8 record. It's 11:25 (sic) a.m.</p> <p>9 (Whereupon, a recess was held.)</p> <p>10 - - -</p> <p>11 VIDEOGRAPHER: We are back on the record.</p> <p>12 It is 12:36 p.m.</p> <p>13 BY MR. WILLIS:</p> <p>14 Q Mr. Jackson, at either of your two postoperative</p> <p>15 visits with Dr. Kansakar at her office, were you</p> <p>16 provided with any sort of paperwork or discharge</p> <p>17 instructions?</p> <p>18 A Not that I can remember. Paperwork or discharge</p> <p>19 instructions? I don't know.</p> <p>20 Q Okay. Once you were back in the St. Clair County Jail</p> <p>21 after your surgery in December, you were provided with</p> <p>22 ostomy bags and other supplies to take care of that,</p> <p>23 weren't you?</p> <p>24 A Not the right -- yeah, I was -- see, the thing about</p> <p>25 it was -- and that's where it all begin. When they</p>	<p style="text-align: right;">Page 43</p> <p>1 I needed them every time because I had a dip in my</p> <p>2 stomach and the bag was leaking. The stuff would leak</p> <p>3 out on me when I would lay down or -- you know what I</p> <p>4 mean? -- roll over, because of the dip. But the over</p> <p>5 rings that they supplied me sealed it up perfectly,</p> <p>6 and, you know, that's what happened.</p> <p>7 Q So you did get some of those over rings; right?</p> <p>8 A She gave me one -- or maybe two a week. She gave me</p> <p>9 one and then, like, after two weeks she stopped</p> <p>10 ordering them, period. So I didn't get them anymore.</p> <p>11 I just had to use the paste. And she told me I had to</p> <p>12 make do.</p> <p>13 Q You said you were given a paste to help with the</p> <p>14 leakage?</p> <p>15 A No. You use this paste. That's what you ordinarily</p> <p>16 get automatically. You put the paste around the stoma</p> <p>17 and then you put the patch on. That's the normally --</p> <p>18 the over ring -- you know, she told me to use that</p> <p>19 instead of the over ring because they couldn't afford</p> <p>20 it. But I told her every time I used that, the stuff</p> <p>21 would leak out on me until my flesh healed. Once it</p> <p>22 healed, then I could use the paste.</p> <p>23 Q When did your skin heal?</p> <p>24 A I was in prison. Before, you know --</p> <p>25 THE WITNESS: Can I show him?</p>
<p style="text-align: right;">Page 42</p> <p>1 did the surgery on me, I had, like, a dip around my</p> <p>2 ostomy and my stomach. So it wasn't like -- the patch</p> <p>3 wouldn't go on flat and flush. I was having leakage.</p> <p>4 And it was an over ring that they provided for me, and</p> <p>5 I needed that to keep from leaking. And when I made</p> <p>6 Ms. Colleen aware of it, she -- we got to a big</p> <p>7 confrontation because I made her aware that I</p> <p>8 needed more of the over rings because of the dip in my</p> <p>9 stomach and she told me I had to make do with the</p> <p>10 paste and I had to make it work. And I had -- I</p> <p>11 believe Sergeant Lebeau (phonetic) -- no, it wasn't</p> <p>12 Sergeant Lebeau -- I had a meeting with the sergeant</p> <p>13 about that, and Ms. Colleen said that those over rings</p> <p>14 were too expensive and they couldn't afford them, so I</p> <p>15 would have to make do with one or two a week, I</p> <p>16 believe. I believe she said one a week. And I had to</p> <p>17 change my bag at least three times a week -- I mean my</p> <p>18 patch and I was -- it was constantly leaking because</p> <p>19 of that. Yeah.</p> <p>20 Q So according to the records, you spoke to the sergeant</p> <p>21 about your ostomy supplies?</p> <p>22 A We had a meeting. Me, Nurse Colleen and the sergeant</p> <p>23 had a meeting because we had a big confrontation about</p> <p>24 the over rings. Ms. Colleen said that they couldn't</p> <p>25 afford to give me more than one a week, and I told her</p>	<p style="text-align: right;">Page 44</p> <p>1 MR. CROSS: If he asks.</p> <p>2 THE WITNESS: Okay.</p> <p>3 BY MR. WILLIS:</p> <p>4 Q Were you going to show me?</p> <p>5 A Yeah.</p> <p>6 Q You can go ahead if you want.</p> <p>7 A Okay. Okay. See? And my stoma -- can you see?</p> <p>8 Q I can't really. You're right at the bottom of the</p> <p>9 camera.</p> <p>10 A In my stoma, it was a dip on this side. It dipped in.</p> <p>11 And instead of the ring being flush, it was a space</p> <p>12 where it leaked right there. I needed the over rings</p> <p>13 to make it flush. I would put the paste around it but</p> <p>14 it would still leak right there. It was a dip just</p> <p>15 like that. Do you see how that is? That's how it was</p> <p>16 until after I went to the prison. It was like that.</p> <p>17 It wasn't flush. And the over rings helped it from</p> <p>18 leaking.</p> <p>19 MR. SCARBER: I just want to make a</p> <p>20 statement for the record. I don't want to be</p> <p>21 impersonal but is there a way that we could get a</p> <p>22 photo of that? I mean, if you showed it on the video,</p> <p>23 would you mind if I take a picture with my cellphone,</p> <p>24 or your counsel, just so that I can have that to take</p> <p>25 a look at it?</p>

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<p style="text-align: right;">Page 45</p> <p>1 THE WITNESS: No problem, yeah.</p> <p>2 MR. SCARBER: We can do it afterwards, if</p> <p>3 that's okay.</p> <p>4 And Ken and Dan, if I get a photo, then</p> <p>5 I'll forward it to you as well.</p> <p>6 MR. WILLIS: Yeah. That would be great.</p> <p>7 MR. SCARBER: Okay. As well as</p> <p>8 plaintiff's counsel -- brother counsel.</p> <p>9 MR. CORBET: Thank you.</p> <p>10 BY MR. WILLIS:</p> <p>11 Q Were you able to exercise in jail after you had</p> <p>12 surgery in December?</p> <p>13 A Exercise in the jail after I had the surgery in</p> <p>14 December?</p> <p>15 Q Right.</p> <p>16 A I did not exercise in December. You mean once --</p> <p>17 Q No, no.</p> <p>18 A You mean once it healed up did I exercise?</p> <p>19 Q Correct.</p> <p>20 A Yeah.</p> <p>21 Q While you were still in jail --</p> <p>22 A Yeah, I exercised in jail.</p> <p>23 Q -- but after the surgery.</p> <p>24 A Yes, I exercised in jail after the surgery. Not right</p> <p>25 after the surgery. I had to heal first.</p>	<p style="text-align: right;">Page 47</p> <p>1 Corrections on March 23, 2017. Does that sound about</p> <p>2 right?</p> <p>3 A Yes, sir.</p> <p>4 Q Since you've had your reversal surgery at Harper</p> <p>5 Hospital, once you recovered from that, has anybody</p> <p>6 told you that you're unable to work or anything like</p> <p>7 that?</p> <p>8 A Once I recovered -- oh, from my surgery?</p> <p>9 Q Right.</p> <p>10 A You said was -- did anyone tell me?</p> <p>11 Q Yeah. Did anybody say that you're disabled or you</p> <p>12 can't work or anything like that?</p> <p>13 A I -- okay. Directly after I had the surgery -- the</p> <p>14 reversal surgery?</p> <p>15 Q Yeah. You had a recovery period; correct?</p> <p>16 A Recovery -- no, no one said that. No one said that.</p> <p>17 Q That's all the questions I have now. I'm going to</p> <p>18 listen and see if we've got any more follow-up later</p> <p>19 after Mr. Scarber asks you questions.</p> <p>20 Oh, wait. Before I go, what are your</p> <p>21 sources of income currently?</p> <p>22 A I've been doing construction --</p> <p>23 Q Okay.</p> <p>24 A -- and landscaping.</p> <p>25 Q And -- I'm sorry. I missed the last part.</p>
<p style="text-align: right;">Page 46</p> <p>1 Q Right, right. What type of exercises did you do in</p> <p>2 jail after the surgery, after it healed?</p> <p>3 A Just calisthenics.</p> <p>4 Q Just for clarification, when I asked you about doing</p> <p>5 -- exercising in jail, I was talking about the St.</p> <p>6 Clair County Jail and not later in the MDOC prison.</p> <p>7 Do you understand my question?</p> <p>8 A Uh-huh.</p> <p>9 Q So you were able to do calisthenics after your surgery</p> <p>10 while you were still in the St. Clair County Jail?</p> <p>11 A Yes, after I healed up.</p> <p>12 Q Right. Okay. Thank you. I just wanted to clarify</p> <p>13 because sometimes -- I know I do sometimes, I use the</p> <p>14 words prison and jail the same and they're not</p> <p>15 necessarily the same in this case.</p> <p>16 So I assume you had some type of a</p> <p>17 hearing with the St. Clair County Circuit Court before</p> <p>18 you were sent to the MDOC?</p> <p>19 A A hearing?</p> <p>20 Q Yeah. Did you have to go to the court to -- did you</p> <p>21 plead guilty?</p> <p>22 A Yeah.</p> <p>23 Q So you didn't go to trial; correct?</p> <p>24 A No, sir.</p> <p>25 Q And you were transferred to the Michigan Department of</p>	<p style="text-align: right;">Page 48</p> <p>1 A I've been doing construction and landscaping and</p> <p>2 stimulus.</p> <p>3 Q Are you getting any unemployment benefits?</p> <p>4 A No, sir.</p> <p>5 Q Do you get a Bridge card or any other assistance?</p> <p>6 A Yes, sir. I receive food stamps.</p> <p>7 Q So other than the stimulus payments and the food</p> <p>8 stamps, any other income that you're getting from the</p> <p>9 state or the federal government?</p> <p>10 A No, sir.</p> <p>11 MR. WILLIS: That's all I have for right</p> <p>12 now. Thank you.</p> <p>13 THE WITNESS: Thank you.</p> <p>14 MR. SCARBER: All right. Let's -- I</p> <p>15 think I've got an idea that might work a little</p> <p>16 better, then I'm not so close to the court reporter.</p> <p>17 Since the camera man has already got it going that way</p> <p>18 on you, what if I kind of move over so I'm facing you</p> <p>19 like that?</p> <p>20 THE WITNESS: Yeah. Thank you.</p> <p>21 VIDEOGRAPHER: Do you want to go off the</p> <p>22 record, then?</p> <p>23 MR. SCARBER: Yeah, we can go off the</p> <p>24 record.</p> <p>25 VIDEOGRAPHER: We are going off the</p>



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<p style="text-align: right;">Page 49</p> <p>1 record. It is 12:51 p.m. 2 (Whereupon, a brief recess was held.) 3 - - - 4 VIDEOGRAPHER: We are back on the record. 5 It is 12:58 p.m. 6 - - - 7 EXAMINATION 8 BY MR. SCARBER: 9 Q Good afternoon, Mr. Jackson. My name is Devlin 10 Scarber and my law firm is representing the Corizon 11 defendants and Dr. Papendick. We had a brief 12 opportunity to introduce ourselves a little earlier. 13 I'm going to have some follow-up questions to the 14 questions asked by Mr. Corbet and Mr. Willis on behalf 15 of their parties in this matter. 16 Have you ever had your deposition taken 17 before? 18 A No, sir. 19 Q Have you reviewed anything in preparation for today's 20 deposition such as any records, any documents or 21 anything like that? 22 A I went over my medical records. 23 Q And which records did you go over, if you know? 24 A Just all my medical history. Most of it was from, you 25 know, my surgery.</p>	<p style="text-align: right;">Page 51</p> <p>1 for attorneys. 2 Q So you -- the testimony in this case is that I think 3 you entered into the MDOC, Michigan Department of 4 Corrections, at about -- on May -- I'm sorry -- was it 5 March 23rd of 2017 or so? 6 A Uh-huh. 7 Q Were you already seeking an attorney prior to that? 8 A I was in the county jail, so I don't understand what 9 you mean. 10 Q Okay. Let me rephrase the question. You indicated 11 just a second ago that you started seeking an attorney 12 to represent you regarding some of those claims 13 immediately -- you said as soon as you got to the 14 prison. 15 A Yeah. I started on finding out attorneys I could 16 write. 17 Q And was that about a week after you got to prison? 18 A I'm not for sure, sir. 19 Q Was it within the first month or two? 20 A I'm not for sure, sir. I don't -- it was too many 21 years ago. I don't want to lie to you. 22 Q Okay. I appreciate that. And I'm just trying to get 23 an idea of what you meant "as soon as" -- what you 24 meant by "as soon as you got to prison." So 25 that's kind of -- what did you mean when you said "as</p>
<p style="text-align: right;">Page 50</p> <p>1 Q Did you review any testimony of any other persons in 2 this particular case? And what I mean -- let me 3 rephrase that question. Did you review any testimony 4 from Dr. Kansakar? 5 A You mean a deposition? 6 Q I'm sorry. Absolutely. A deposition. Did you review 7 Dr. Kansakar's deposition at all? 8 A Yes. 9 Q When did you review that? 10 A Just over the weekend. 11 Q And that was provided to you by your attorney? 12 A Yes, sir. 13 Q And without getting into necessarily the contents of 14 what you and your attorney have discussed, when did 15 you first seek an attorney to represent you in this 16 matter? 17 A When I was in -- when did I first seek an attorney? 18 Q Particularly to represent you in this particular claim 19 that you're -- these claims that you are bringing in 20 this lawsuit, yes. 21 A You are asking when did I first seek an attorney. 22 When I was in prison. 23 Q Was that early on in your prison stint or was that 24 later? 25 A As soon as I got there I immediately started looking</p>	<p style="text-align: right;">Page 52</p> <p>1 soon as"? What was your -- how -- 2 A In the beginning. 3 Q In the beginning. So you got there in March of 2017, 4 it looks like. 5 A Uh-huh. 6 Q Would you say you had started looking for -- 7 A March of 2017. 8 Q So you started looking for attorneys in about March of 9 2017? 10 A I started looking into my case. 11 Q In March of 2017? 12 A Yeah, I started -- no. I would say I was definitely 13 having concerns about it in the county jail and 14 everything -- having concerns about my issue and what 15 was going on in the county jail, but I wasn't able to 16 reach out to anyone until I got to prison. 17 Q Okay. So you had already decided while you were in 18 jail that you wanted to pursue some kind of legal 19 action and you weren't able -- you didn't really have 20 the resources to connect with any attorneys at that 21 point. But when you got to the Michigan Department of 22 Corrections you did have the resources and that's when 23 you reached out to an attorney? 24 A Yes. 25 Q And was Mr. Cross's firm, Mr. Margolis, were those the</p>

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<p style="text-align: right;">Page 53</p> <p>1 first attorneys that you reached out to?</p> <p>2 A No, sir.</p> <p>3 Q How many attorneys had you reached out to before they</p> <p>4 took the case?</p> <p>5 A I believe three.</p> <p>6 Q And the other attorneys had denied the case?</p> <p>7 A No. They just said that I should seek other -- other</p> <p>8 legal -- yeah, they said I should seek someone else.</p> <p>9 But as far as it wasn't financially feasible for their</p> <p>10 office, but I should definitely seek law advice.</p> <p>11 Q Okay. So they weren't interested, for whatever</p> <p>12 reasons, but they advised you to continue trying to</p> <p>13 pursue it if you wanted to?</p> <p>14 A Yeah. They said -- they said yeah, basically. Yeah,</p> <p>15 they said that it wasn't financially feasible for</p> <p>16 their office. Financially.</p> <p>17 Q Okay.</p> <p>18 A That's what they said -- financially feasible for</p> <p>19 their office.</p> <p>20 Q When did you actually -- without getting into the</p> <p>21 contents of what was discussed with Mr. Margolis or</p> <p>22 Mr. Cross, when did you actually connect with them to</p> <p>23 get them to represent you in this case?</p> <p>24 A You talking about Mr. Margolis?</p> <p>25 Q Yes.</p>	<p style="text-align: right;">Page 55</p> <p>1 out of prison, and that was Mr. Margolis?</p> <p>2 A Yes.</p> <p>3 Q You had some medical issues before you got into --</p> <p>4 before you had even gone to jail; correct?</p> <p>5 A Due to the diverticulitis, but I wasn't aware of it.</p> <p>6 Q And you had -- you know, I've got -- if I can just</p> <p>7 look at my notes here. I have that in -- it looks</p> <p>8 like about March of 2011 you had sought treatment for</p> <p>9 an STD back at that time. Does that ring a bell?</p> <p>10 A A sexually transmitted infection?</p> <p>11 Q Well, they call it STDs and STIs.</p> <p>12 A Yes, STI.</p> <p>13 Q Okay.</p> <p>14 A Yes.</p> <p>15 Q So that sounds familiar, somewhere around March of</p> <p>16 2011 you sought treatment for an STI?</p> <p>17 A Yeah.</p> <p>18 Q In about December of 2010 it looks like you also</p> <p>19 sought treatment for an STI. Does that sound about</p> <p>20 right?</p> <p>21 A Yes, sir.</p> <p>22 Q Looks like in August of 2014 you sought medical</p> <p>23 treatment?</p> <p>24 A For an STI?</p> <p>25 Q Yeah.</p>
<p style="text-align: right;">Page 54</p> <p>1 A When I got out of prison.</p> <p>2 Q Okay. So did you contact him -- did you ever speak</p> <p>3 with him while you were in prison --</p> <p>4 A No.</p> <p>5 Q -- or just after?</p> <p>6 A After I got out of prison.</p> <p>7 Q Now, you had tried in March of 2017 to obtain some</p> <p>8 legal representation.</p> <p>9 A March of --</p> <p>10 Q March of 2017 is what we just talked about.</p> <p>11 A I'm not saying that I tried to obtain any legal</p> <p>12 representation in March. I've not even said that.</p> <p>13 Who said that? You said that. I didn't say that.</p> <p>14 Q I thought from your prior testimony that's when you</p> <p>15 started looking into and trying to reach out --</p> <p>16 A Looking into my case.</p> <p>17 Q Started looking into your case?</p> <p>18 A I started looking into my -- you know, the situation.</p> <p>19 Looking into it.</p> <p>20 Q Okay.</p> <p>21 A Yes. And also was trying to reach out but I hadn't</p> <p>22 retained one or nothing at that time.</p> <p>23 Q Okay. So that was in March of -- around March of 2017</p> <p>24 or so. But while you were in prison you weren't able</p> <p>25 to get any attorneys to represent you until you got</p>	<p style="text-align: right;">Page 56</p> <p>1 A Yes, sir.</p> <p>2 Q And it looks like in December of 2014 you sought</p> <p>3 treatment for an STI. Does that sound about right?</p> <p>4 A Yes, that sounds about right.</p> <p>5 Q There was even a note in your December 2014 records by</p> <p>6 one of the nurses. Let me show you this record. I'm</p> <p>7 going to let you take a look at this note down at the</p> <p>8 bottom here and then you can give it back to me.</p> <p>9 A Okay.</p> <p>10 MR. WILLIS: Do we know the date of the</p> <p>11 note?</p> <p>12 MR. SCARBER: I'll clarify for the record</p> <p>13 in one second, Counsel.</p> <p>14 MR. WILLIS: Great. Thank you.</p> <p>15 MR. SCARBER: There's a page 2 to it as</p> <p>16 well.</p> <p>17 THE WITNESS: What is this? Okay.</p> <p>18 MR. CROSS: Is that front and back?</p> <p>19 MR. SCARBER: That's the second page to</p> <p>20 the back that he's reading.</p> <p>21 THE WITNESS: Okay. This is --</p> <p>22 BY MR. SCARBER:</p> <p>23 Q I haven't asked you any questions just yet. But I</p> <p>24 will let you explain it. Let me have it back.</p> <p>25 A That's what I'm clarifying. You just asked me -- I</p>

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<p style="text-align: right;">Page 57</p> <p>1 wasn't here for a sexually transmitted infection.</p> <p>2 Q Okay.</p> <p>3 A I was there for my diverticulitis that I wasn't aware</p> <p>4 of -- that it was diverticulitis.</p> <p>5 Q Okay.</p> <p>6 A So I was there -- that's the time when I was first</p> <p>7 hospitalized when I knew I had a stomach -- real bad</p> <p>8 stomach issues. That's what I was having there.</p> <p>9 Q Okay.</p> <p>10 A Not for a sexually -- that's when I first went there</p> <p>11 and they first noted that I had stomach issues.</p> <p>12 Q So this is going back to -- all the way to 2014;</p> <p>13 correct?</p> <p>14 A Yeah, yeah. That was the beginning of my stomach --</p> <p>15 well, I wouldn't say that's the beginning but that's</p> <p>16 when I was on the outside and I went to the hospital</p> <p>17 and let them know I was having stomach issues.</p> <p>18 Q Okay.</p> <p>19 A Yeah.</p> <p>20 Q So this note is -- I have to identify it for the</p> <p>21 record. This is a record taken from the McLaren Port</p> <p>22 Huron Hospital. It's an emergency note.</p> <p>23 A The same place; right?</p> <p>24 Q Yes.</p> <p>25 A That's the same place that -- that's your defendant;</p>	<p style="text-align: right;">Page 59</p> <p>1 answered one of your questions, but I need to</p> <p>2 identify it. It is McLaren Port Huron records. It's</p> <p>3 page 200 and 201 of those records.</p> <p>4 It says, quote, patient discharge</p> <p>5 written. I spoke with the patient about discharge.</p> <p>6 The patient stated he did not receive any care. I</p> <p>7 asked the patient what care he felt he did not</p> <p>8 receive. The patient stated he never received his</p> <p>9 medication and wanted to see another nurse. I told</p> <p>10 the patient I will be glad to get my supervisor. The</p> <p>11 patient continued yelling. I asked the patient again</p> <p>12 not to yell or curse or I will call security. The</p> <p>13 patient left the room, approached the nurses' station,</p> <p>14 continued to yell at the staff, stating he would not</p> <p>15 leave without receiving Tylenol. Security was called</p> <p>16 and I notified the charge nurse. Patient requested</p> <p>17 something to eat.</p> <p>18 This is another note, maybe just slightly</p> <p>19 earlier than that. Same page. It says, quote,</p> <p>20 patient requested something to eat. Spoke with Anna</p> <p>21 who stated he could not eat yet. Spoke with patient</p> <p>22 again who became argumentative, cursing, refusing</p> <p>23 medications. Patient stated, quote, bitch, I am not</p> <p>24 taking that shit until I get something to eat. I</p> <p>25 asked the patient not to yell and to refrain from</p>
<p style="text-align: right;">Page 58</p> <p>1 right? Lake Huron?</p> <p>2 Q I don't represent them and no one is representing</p> <p>3 them.</p> <p>4 A Is that one of the places being sued?</p> <p>5 Q No.</p> <p>6 A No? That's a whole different hospital?</p> <p>7 Q You may have had some treatment at this hospital but</p> <p>8 we're not suing -- your attorney is not suing these</p> <p>9 individuals. I'm just asking you some questions about</p> <p>10 some of the records.</p> <p>11 A Okay. Is that Mercy or Port Huron Hospital?</p> <p>12 Q This is the McLaren Port Huron.</p> <p>13 A So it's the same hospital.</p> <p>14 Q That very well may be.</p> <p>15 A Okay. I'm just letting that be known, that's the same</p> <p>16 hospital. That's all.</p> <p>17 Q The same hospital as what?</p> <p>18 A As Ms. Colleen works at -- or worked at.</p> <p>19 Q She worked at McLaren Port Huron --</p> <p>20 A Yes, sir.</p> <p>21 Q -- in 2014?</p> <p>22 A I mean, that's the same hospital. Yes.</p> <p>23 Q Okay. So this note indicates that -- and you just</p> <p>24 read it -- patient's discharge is written. I'm sorry.</p> <p>25 I didn't even get to identify it because I had</p>	<p style="text-align: right;">Page 60</p> <p>1 cursing. The patient denied cursing, end quote.</p> <p>2 Do you recall that incident?</p> <p>3 A Yes, sir, I recall what you're talking about. They --</p> <p>4 in that situation -- I was hospitalized and put on an</p> <p>5 IV, because my diverticulitis was acting up, but I</p> <p>6 didn't -- I wasn't aware that I had diverticulitis. I</p> <p>7 knew that I was sick and I knew that I was having</p> <p>8 stomach pains and I was, like, passing out. I was in</p> <p>9 -- going into cold sweats. I had fever. So I went to</p> <p>10 the hospital and, you know, about that. I got into it</p> <p>11 with those people because I felt like they did not</p> <p>12 give me any medical treatment. They did not diagnose</p> <p>13 me at that time for the diverticulitis. They didn't</p> <p>14 even know what was wrong with me. They didn't care.</p> <p>15 I felt like they didn't care because they just gave me</p> <p>16 basically, like, an IV and I felt like they was just</p> <p>17 rushing me out because my insurance wasn't valid at</p> <p>18 the time.</p> <p>19 Now, that's all the reason why I ended up</p> <p>20 in such bad shape, because I went there when I</p> <p>21 originally, you know, was having problems and I felt</p> <p>22 like they was rushing me out. That's why I ended up</p> <p>23 getting into it with a nurse. Because when I went</p> <p>24 there I told the nurse that I haven't ate in days. I</p> <p>25 told all those people that I haven't ate in, like, two</p>

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<p style="text-align: right;">Page 61</p> <p>1 days, and I couldn't eat because I was feeling sick</p> <p>2 and it was something wrong with me. And I don't feel</p> <p>3 like they did the proper test and I don't feel like</p> <p>4 they did the proper care. They, like, rushed me out.</p> <p>5 And I told them that -- they wanted me to</p> <p>6 take some medicine and I told them I couldn't take</p> <p>7 some medicine because I was nauseous and I needed to</p> <p>8 eat. They refused to give me any food. They had</p> <p>9 called the security officer and the supervisor just to</p> <p>10 okay me to get some crackers that day. Yeah, I had a</p> <p>11 bad time with them because I felt like they were</p> <p>12 rushing me out and they wasn't getting down to the</p> <p>13 bottom of my situation. And I was not hospitalized</p> <p>14 for -- it will tell you what I was hospitalized for --</p> <p>15 the infection. I was hospitalized for -- at that time</p> <p>16 for stomach issues. So that's what happened with</p> <p>17 that. Yeah, I do recall.</p> <p>18 Q If the record indicates --</p> <p>19 MR. CORBET: Devlin, what page was that?</p> <p>20 I'm sorry to interrupt. What page was that again?</p> <p>21 MR. SCARBER: That was on page 200, 201.</p> <p>22 MR. CORBET: Thank you. Sorry to bother</p> <p>23 you.</p> <p>24 MR. SCARBER: No problem.</p> <p>25 BY MR. SCARBER:</p>	<p style="text-align: right;">Page 63</p> <p>1 is related to the issue that --</p> <p>2 A I know for sure that was what the problem was, and I</p> <p>3 feel like if I would have diagnosed it back then, then</p> <p>4 it wouldn't have got as bad. But I definitely went</p> <p>5 there and made them aware. And that's why I had a</p> <p>6 problem with -- it was, like -- I'm, like, it's more</p> <p>7 wrong with me. And they, like, "Ah, you're okay. We</p> <p>8 gave you the IV. Get out of here."</p> <p>9 Q So you would agree, then, that the problems that you</p> <p>10 ultimately ended up having when you became</p> <p>11 incarcerated were things that had started well before</p> <p>12 your incarceration; right?</p> <p>13 A What do you mean? Rephrase that question.</p> <p>14 Q You would agree with me that the problems that you</p> <p>15 began to experience when you were incarcerated in the</p> <p>16 jail and in the prison system, those were medical</p> <p>17 issues that had been developing for some time prior to</p> <p>18 your incarceration; correct?</p> <p>19 A I wouldn't say that. I would say that while I was</p> <p>20 incarcerated I had medical problems and they didn't</p> <p>21 treat me.</p> <p>22 Q Would you agree with me, though -- and I'm just using</p> <p>23 your testimony from a little while ago. Would you</p> <p>24 agree with me, though, that the issues that you</p> <p>25 ultimately were needing treatment for in the jail and</p>
<p style="text-align: right;">Page 62</p> <p>1 Q If the record does indicate that you were there for a</p> <p>2 chief complaint of abdominal pain, would that sound</p> <p>3 more accurate?</p> <p>4 A Yes. Abdominal pain, yes. And that's why I was</p> <p>5 upset, because I felt like they didn't do anything for</p> <p>6 me. They just gave me an IV and started to discharge</p> <p>7 me. Then she tried to give me some medicine before</p> <p>8 I'm discharged. I'm, like, I can't take it. I</p> <p>9 haven't eaten anything. It was basically, like, pack</p> <p>10 up, you got to go. I felt like they were rushing me</p> <p>11 out of the hospital before I got my treatment. And</p> <p>12 that's what that was about.</p> <p>13 Q So that you would agree that the -- you mentioned</p> <p>14 earlier you think this was the beginning of when your</p> <p>15 fistula started or at least --</p> <p>16 A No, it was no fistula. That was cramping.</p> <p>17 Q So this was a sign of the problem that you ultimately</p> <p>18 ended up having after you became incarcerated; right?</p> <p>19 A Yes.</p> <p>20 Q So when you were in the jail you believe that this was</p> <p>21 something that was leading up to that?</p> <p>22 A Huh? Excuse me?</p> <p>23 Q Let me rephrase my question. This particular time</p> <p>24 you're in the hospital in 2014, you believe that this</p> <p>25 issue that you were there for at that particular time</p>	<p style="text-align: right;">Page 64</p> <p>1 the prison system were issues that were becoming a</p> <p>2 problem for you back in 2014 based upon the note that</p> <p>3 we just read and your explanation of what was going on</p> <p>4 back then?</p> <p>5 A No. I wasn't needing treatment. I didn't have a</p> <p>6 fistula back then in 2014. I got treated for a</p> <p>7 fistula and a colostomy reversal.</p> <p>8 Q You testified a short while ago that you believe that</p> <p>9 this is what caused your fistula to be worse when you</p> <p>10 got --</p> <p>11 A No. That's what caused the cramping to be worse, by</p> <p>12 me not originally getting diagnosed with</p> <p>13 diverticulitis.</p> <p>14 Q So you had a diverticulitis problem prior to going</p> <p>15 into the jail system; correct?</p> <p>16 A I'm not sure, but I believe that that's what I had.</p> <p>17 I'm not sure. I can't tell you for sure, but I</p> <p>18 believe that's what I had.</p> <p>19 Q Okay. And you believe that if they had done more</p> <p>20 during this time in 2014 when you were there, your</p> <p>21 situation might not have ended up to the point where</p> <p>22 it ended up when you were in prison, right, or in</p> <p>23 jail?</p> <p>24 A What do you mean by situation? I believe that if I</p> <p>25 would have got diagnosed with diverticulitis sooner, I</p>



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<p style="text-align: right;">Page 65</p> <p>1 wouldn't have had to wear a bag. I believe that.</p> <p>2 Q And that was prior to your incarceration in jail and</p> <p>3 prison. That's what I'm asking you.</p> <p>4 A I still don't understand what you saying.</p> <p>5 Q You may have answered my question.</p> <p>6 A Right, that's what I'm thinking.</p> <p>7 Q But I just want to be clear. Had they had done what</p> <p>8 you believe they should have done prior to you even</p> <p>9 going to jail and prison, you believe your situation</p> <p>10 wouldn't have been as --</p> <p>11 A I can't say that. I can't say that. I can't answer</p> <p>12 that.</p> <p>13 Q I thought you just testified to that.</p> <p>14 A That's -- I don't know what -- did I? Did I just</p> <p>15 testify to that? No, I didn't.</p> <p>16 Q Oh, I thought you did.</p> <p>17 THE WITNESS: I'm trying to figure what</p> <p>18 he's saying.</p> <p>19 MR. CROSS: Read back the question and</p> <p>20 answer.</p> <p>21 MR. SCARBER: Let's see if we have our</p> <p>22 answer.</p> <p>23 Could you go back, Madam Court Reporter,</p> <p>24 to the part where he was answering the question about</p> <p>25 what we're talking about now, about the situation</p>	<p style="text-align: right;">Page 67</p> <p>1 say that while I was incarcerated I had medical</p> <p>2 problems and they didn't treat me.")</p> <p>3 MR. SCARBER: Keep going.</p> <p>4 I think I said the wrong word, back,</p> <p>5 instead of come up but don't -- but let's move</p> <p>6 forward. The record will stand for itself.</p> <p>7 BY MR. SCARBER:</p> <p>8 Q I think you were clear, though, you believe if you had</p> <p>9 been diagnosed with diverticulitis sooner, you would</p> <p>10 not have had to wear the colostomy bag; correct?</p> <p>11 A Right.</p> <p>12 Q And when was the first time you were diagnosed with</p> <p>13 diverticulitis as you are aware?</p> <p>14 A In December of 2019. No, no. '16. December, right</p> <p>15 before the surgery. December, right before the</p> <p>16 surgery.</p> <p>17 Q Were you ever diagnosed with colitis?</p> <p>18 A Colitis? No. Not that I'm aware of. I had</p> <p>19 diverticulitis.</p> <p>20 Q Let me show you a record from 12/10/2016.</p> <p>21 A 12/10/2016.</p> <p>22 Q And this is a progress note from Lake Huron Medical</p> <p>23 Center, and it's identified as page number 532.</p> <p>24 Mr. Jackson, according to this record, it</p> <p>25 says, quote, patient apparently was diagnosed with</p>
<p style="text-align: right;">Page 66</p> <p>1 would not have led to him wearing the bag?</p> <p>2 COURT REPORTER: Let me see if I can find</p> <p>3 it.</p> <p>4 THE WITNESS: If they --</p> <p>5 COURT REPORTER: Let me answer.</p> <p>6 MR. SCARBER: Wait a second. I'm only</p> <p>7 stopping you because she's looking --</p> <p>8 THE WITNESS: I'm good with it. Thank</p> <p>9 you.</p> <p>10 (The following was read back by the</p> <p>11 reporter:</p> <p>12 "I believe that if I had gotten diagnosed</p> <p>13 with diverticulitis sooner, I wouldn't have had to</p> <p>14 wear a bag.")</p> <p>15 COURT REPORTER: Is that it or back</p> <p>16 further?</p> <p>17 MR. SCARBER: Go a little back further.</p> <p>18 (The following question and answer was</p> <p>19 read back by the reporter:</p> <p>20 Question: "You would agree with me that</p> <p>21 the problems that you began to experience when you</p> <p>22 were incarcerated in jail and in the prison system,</p> <p>23 those were medical issues that had been developing for</p> <p>24 some time prior to your incarceration; correct?"</p> <p>25 Answer: "I wouldn't say that. I would</p>	<p style="text-align: right;">Page 68</p> <p>1 colitis on a CT scan of the abdomen over two years</p> <p>2 ago. Patient never had a colonoscopy in the past.</p> <p>3 Patient is status post colonoscopy by Dr. Kansakar,</p> <p>4 showed complicated sigmoid diverticulitis with</p> <p>5 colovesical fistula without abscess, end quote.</p> <p>6 A Patient was diagnosed with colitis?</p> <p>7 Q Yes. I guess my question for you is, you had gone to</p> <p>8 the hospital prior to you being -- becoming</p> <p>9 incarcerated in the jail and prison; correct?</p> <p>10 A We just discussed that.</p> <p>11 Q Okay. I just mentioned one of the visits but you had</p> <p>12 gone to the hospital prior; correct? Prior to your</p> <p>13 time at the jail.</p> <p>14 A Uh-huh.</p> <p>15 Q Prior to you becoming incarcerated in the jail, you</p> <p>16 did go to the hospital for treatment of issues related</p> <p>17 to --</p> <p>18 A The abdominal pains.</p> <p>19 Q -- abdominal pain, bowels, things like that.</p> <p>20 A Before I went to the jail? Yes, I did.</p> <p>21 Q So my question for you is, it says that two years</p> <p>22 earlier from the time you had your surgery -- at least</p> <p>23 according to this record -- that you had been</p> <p>24 diagnosed with colitis and you were supposed to have</p> <p>25 gotten a colonoscopy. Why did you never get one?</p>

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<p style="text-align: right;">Page 69</p> <p>1 A I was supposed to get a colonoscopy and I -- I wasn't</p> <p>2 told I was supposed to get -- I had got tested and</p> <p>3 they didn't tell me I had colitis. They actually told</p> <p>4 me I had irritable bowel syndrome.</p> <p>5 Q Okay. And what did you do about it?</p> <p>6 A They told me to take amoxicillin with potassium. Gave</p> <p>7 me a script. I did. I took it.</p> <p>8 I had a test done and when they took --</p> <p>9 scraped something on the card and stuff like that</p> <p>10 prior, but they did not -- they didn't tell me I had</p> <p>11 colitis. When I went to the St. Clair County Jail</p> <p>12 they had my medical records and they wasn't aware of</p> <p>13 me having colitis. I went -- reported a urinal tract</p> <p>14 infection for six months. They told me I had a urinal</p> <p>15 tract infection for six months in the St. Clair County</p> <p>16 Jail because I was urinating particles out of my penis</p> <p>17 and I had bubbles coming out of my penis. At no time</p> <p>18 was they aware of me having colitis. They didn't tell</p> <p>19 me I had colitis. I never even knew that I had</p> <p>20 colitis at all. This is brand new, new to me.</p> <p>21 Q My only question -- and I appreciate that answer, but</p> <p>22 it indicates that you were supposed to have had a</p> <p>23 colonoscopy --</p> <p>24 A I had that.</p> <p>25 Q -- before you were incarcerated, two years prior to</p>	<p style="text-align: right;">Page 71</p> <p>1 recall that?</p> <p>2 A Uh-huh.</p> <p>3 Q What was the situation regarding that?</p> <p>4 A They -- I went to the hospital. I was urinating blood</p> <p>5 out of my urine. They had me pee in a cup and they</p> <p>6 basically just gave me some antibiotics and discharged</p> <p>7 me.</p> <p>8 Q Do you remember what they diagnosed you with?</p> <p>9 A They never diagnosed me. Not that I can remember.</p> <p>10 Same hospital that we're talking about.</p> <p>11 Which hospital is it? Medical -- what is</p> <p>12 it?</p> <p>13 Q McLaren Port Huron.</p> <p>14 A McLaren. Same hospital.</p> <p>15 Q It indicates that at that particular time -- and we're</p> <p>16 talking about from the record of February 1, 2015 --</p> <p>17 that the clinical impression was hematuria, sexually</p> <p>18 transmitted disease, and urinary tract infection.</p> <p>19 Hematuria, meaning blood in the urine. Do you recall</p> <p>20 being given instructions about a sexually transmitted</p> <p>21 disease at that point?</p> <p>22 A Uh-huh. No, sir. I only know they told me that --</p> <p>23 see, when you go in, they just told me to pee in a cup</p> <p>24 and that was it and they gave me antibiotic. That was</p> <p>25 it. They never said anything or I didn't get any</p>
<p style="text-align: right;">Page 70</p> <p>1 that.</p> <p>2 A I did everything they told me that I was supposed to</p> <p>3 have. I went in and they put something up my rectum</p> <p>4 and scraped it on a card. Put me through a machine</p> <p>5 and that was that. They told me -- gave me a piece of</p> <p>6 paper and they told me I had irritable bowel syndrome</p> <p>7 and they gave me a prescription that told me to take</p> <p>8 amoxicillin with potassium and that was it. You may</p> <p>9 not have the follow-up records or I wasn't aware but I</p> <p>10 did everything that they told me to do at the doctor.</p> <p>11 Q But even that record, you would agree, indicates that</p> <p>12 you had had some kind of problem with your bowels or</p> <p>13 bowel system prior to your incarceration in the jail</p> <p>14 and in the Michigan --</p> <p>15 A Oh, for sure I had bowel problems.</p> <p>16 Q Okay.</p> <p>17 A Actually --</p> <p>18 Q I don't have any further questions on that right now.</p> <p>19 A Okay. I'm just elaborating on my question, that's</p> <p>20 all.</p> <p>21 Q And your counsel can come back, too, if he wants to</p> <p>22 ask you some follow-ups on it as well.</p> <p>23 A Uh-huh.</p> <p>24 Q On February of 2015, you -- it looks like you were you</p> <p>25 at the hospital for blood in your urine. Do you</p>	<p style="text-align: right;">Page 72</p> <p>1 results or anything.</p> <p>2 Q It indicates on this particular note in the</p> <p>3 disposition, sir, instructions regarding sexually</p> <p>4 transmitted diseases. Can you take a look at that?</p> <p>5 This is page 149.</p> <p>6 A Instructions?</p> <p>7 Q Let me just look right here.</p> <p>8 A Where are you saying?</p> <p>9 Q That little remark.</p> <p>10 A Can you say that again? It indicates instructions?</p> <p>11 Q Your counsel is going to show you a little mark I</p> <p>12 have. Can you tell me what it states right there?</p> <p>13 Just where that little mark is.</p> <p>14 A What mark?</p> <p>15 Q This one, right there.</p> <p>16 A Instructions. Sexually transmitted disease.</p> <p>17 Self-care. Hold on.</p> <p>18 Okay. This is what they gave me. Yeah,</p> <p>19 they give me antibiotics and released me.</p> <p>20 Q Okay. So I read that correctly, that you were</p> <p>21 instructed about sexually transmitted diseases and</p> <p>22 then they gave you antibiotics; correct?</p> <p>23 A Yeah. Does it say that's what the problem was?</p> <p>24 Q I'm just asking you about what the disposition was at</p> <p>25 the emergency room.</p>



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<p style="text-align: right;">Page 73</p> <p>1 A Okay. But they ain't say that's what the problem was.</p> <p>2 MR. CROSS: He asks the questions.</p> <p>3 THE WITNESS: Okay.</p> <p>4 BY MR. SCARBER:</p> <p>5 Q And you didn't sue McLaren Port Huron; correct?</p> <p>6 A Who?</p> <p>7 Q McLaren Port Huron Hospital. You mentioned you</p> <p>8 thought they were part of this lawsuit but they're</p> <p>9 not. You never sued them; correct?</p> <p>10 MR. CROSS: For the record, the hospital</p> <p>11 was sold.</p> <p>12 THE WITNESS: Okay.</p> <p>13 BY MR. SCARBER:</p> <p>14 Q Let me just clarify your allegations in the Complaint.</p> <p>15 You're not suing the hospital per se for something</p> <p>16 that happened to you prior to you going into jail in</p> <p>17 2016. You would agree with that?</p> <p>18 A Prior to me going to jail? No, I'm not.</p> <p>19 Q Okay. What I'm citing to you are things that occurred</p> <p>20 prior to you going to jail.</p> <p>21 A With the same hospital I'm suing; right?</p> <p>22 Q Your counsel can clarify that but --</p> <p>23 A I'm asking.</p> <p>24 Q I'm not aware of you having a lawsuit against the</p> <p>25 hospital in that sense. So maybe you can clarify --</p>	<p style="text-align: right;">Page 75</p> <p>1 pages 133 to 134. And these records indicate that you</p> <p>2 were being seen at that time for complaint of penile</p> <p>3 discharge. Does that ring a bell?</p> <p>4 A When?</p> <p>5 Q February of 2015.</p> <p>6 A Okay.</p> <p>7 Q Does it ring a bell to you -- do you recall being</p> <p>8 there in approximately February 2015 for problems with</p> <p>9 penile discharge and sexually transmitted diseases?</p> <p>10 A Oh, you mean sexually transmitted infection. The</p> <p>11 penile discharge, yes.</p> <p>12 Q They called it disease on here. I understand you're</p> <p>13 making a distinction, but some type of sexually</p> <p>14 transmitted --</p> <p>15 A Infection.</p> <p>16 Q -- infection you were there for?</p> <p>17 A Yes.</p> <p>18 Q How about on September the 13th of 2015, do you recall</p> <p>19 being at the McLaren Port Huron emergency room then</p> <p>20 for a sexually transmitted disease?</p> <p>21 A Yes. Infection, yes.</p> <p>22 Q On -- you were released from prison when? Do you</p> <p>23 recall?</p> <p>24 A May 16, 2019.</p> <p>25 Q Do you recall being seen by the McLaren Port Huron</p>
<p style="text-align: right;">Page 74</p> <p>1 MR. CROSS: Kohchise, you are suing Prime</p> <p>2 Healthcare. Prime Healthcare bought this hospital</p> <p>3 from another company that owned it prior to 2015. And</p> <p>4 you're not suing that other company. You're suing</p> <p>5 Prime Healthcare for things that happened while you</p> <p>6 were in jail. So none of the things that he's talking</p> <p>7 about from before you went to jail are a part of the</p> <p>8 lawsuit.</p> <p>9 THE WITNESS: Okay. There we go.</p> <p>10 BY MR. SCARBER:</p> <p>11 Q It sounds like you feel like from your understanding,</p> <p>12 though, that --</p> <p>13 A No. No, I don't.</p> <p>14 Q You don't feel like they misdiagnosed you at --</p> <p>15 A No, no.</p> <p>16 Q I thought you testified to that earlier.</p> <p>17 A You said what? No, I didn't.</p> <p>18 Q You didn't testify that they should have discovered</p> <p>19 something or treated something earlier that they</p> <p>20 didn't treat?</p> <p>21 A No.</p> <p>22 Q I'll rely on your prior testimony.</p> <p>23 I have a record from February 15th of</p> <p>24 2016. I'm sorry. February the 16th of 2015. I stand</p> <p>25 corrected. And this is at McLaren Port Huron, records</p>	<p style="text-align: right;">Page 76</p> <p>1 Hospital on or about May 23rd of 2020 for another</p> <p>2 sexually transmitted infection?</p> <p>3 A Yes, sir.</p> <p>4 Q And this would have been after your release from</p> <p>5 prison; correct?</p> <p>6 A Correct.</p> <p>7 Q So after you were released from prison, you were able</p> <p>8 to resume having sexual intercourse?</p> <p>9 A Did I have sexual intercourse when I left prison?</p> <p>10 Yes, sir, I did.</p> <p>11 Q My question is, you were able to resume it at that</p> <p>12 point similar to how you had done it prior to you</p> <p>13 becoming incarcerated in 2016; correct?</p> <p>14 A I don't know -- I don't know what you mean by that,</p> <p>15 sir.</p> <p>16 Q You were having --</p> <p>17 A I had sex before I went to prison. Yes, I had sex</p> <p>18 after I got out of prison.</p> <p>19 Q And you -- it sounds like even in this situation</p> <p>20 you -- it was the same type of activity that you had</p> <p>21 engaged in previously because you are still back to</p> <p>22 the hospital emergency room for an STI again; correct?</p> <p>23 Sexually transmitted infection.</p> <p>24 A What do you mean same activity? What do you mean?</p> <p>25 Having sex? Yes, I had sex.</p>

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<p style="text-align: right;">Page 77</p> <p>1 Q I understand that.</p> <p>2 A Okay. So what do you mean?</p> <p>3 Q But prior to you becoming incarcerated you were not</p> <p>4 only having sex but getting sexually transmitted</p> <p>5 infections; correct?</p> <p>6 A That's what happens when you have sex with someone who</p> <p>7 has an infection.</p> <p>8 Q Are you having sex with the same person that's giving</p> <p>9 you this infection?</p> <p>10 A What do you mean? When?</p> <p>11 Q When you were getting these infections that you were</p> <p>12 going to the emergency room for -- consistently for</p> <p>13 the last -- maybe few years before you were</p> <p>14 incarcerated in --</p> <p>15 A Did I get the infection from the same girl that I got</p> <p>16 it from before I went to prison? Is that what you're</p> <p>17 asking me?</p> <p>18 Q Why don't we start with that question. Sure.</p> <p>19 A I don't know.</p> <p>20 Q And then I guess my overall question is, the same type</p> <p>21 of situation that you were in --</p> <p>22 A What situation is that? I haven't said.</p> <p>23 Q You've got to let me finish my question.</p> <p>24 The same type of situation you were in</p> <p>25 prior to becoming incarcerated, where you were having</p>	<p style="text-align: right;">Page 79</p> <p>1 Q I don't think I finished it.</p> <p>2 A If you haven't finished the question, I can't answer</p> <p>3 it.</p> <p>4 Q Okay. But my question is, during your April 23, 2020</p> <p>5 visit at the emergency room I did not see anywhere in</p> <p>6 your record where you were complaining about any</p> <p>7 problems with your colostomy reversal or colostomy at</p> <p>8 all. You would agree there were no complaints at that</p> <p>9 time?</p> <p>10 A I did not have a colostomy at that time. I was</p> <p>11 already reversed.</p> <p>12 Q But you would agree with me that you weren't having</p> <p>13 any issues or complaints when you went to the hospital</p> <p>14 at that time for any colostomy or colostomy reversal</p> <p>15 that you had had; correct?</p> <p>16 A No, I'm not saying correct. Actually, I visited the</p> <p>17 hospital and after I had been reversed I have had</p> <p>18 problems and I made my doctor, Dr. Webber, aware.</p> <p>19 Q My question is, on April the 23rd of --</p> <p>20 A You talking about when I went to the hospital for a</p> <p>21 sexually transmitted infection?</p> <p>22 Q Okay. Mr. Jackson --</p> <p>23 A I'm asking you a question.</p> <p>24 Q But you've got to let me finish my question before you</p> <p>25 try to answer.</p>
<p style="text-align: right;">Page 78</p> <p>1 sex and getting a sexually transmitted infection, you</p> <p>2 were engaged in that same type of activity after you</p> <p>3 were released from prison, where you were engaging in</p> <p>4 sexual activity and getting a sexually transmitted</p> <p>5 infection.</p> <p>6 A I'm not understanding what you mean. I had sex -- I</p> <p>7 just answered that -- before I went to the prison. I</p> <p>8 had sex when I got out of prison. I caught a sexually</p> <p>9 transmitted disease before I went to prison. I also</p> <p>10 caught one -- infection when I was released from</p> <p>11 prison.</p> <p>12 Q Similar to what had happened before you were</p> <p>13 incarcerated?</p> <p>14 A The same thing happened to me before, yes.</p> <p>15 Q Okay. And I didn't note any complaints in your record</p> <p>16 from April 23, 2020 about your colostomy reversal</p> <p>17 posing any problems for you; correct?</p> <p>18 A When?</p> <p>19 Q In April 2020, when you were at the hospital for the</p> <p>20 sexually transmitted infection. This was after you</p> <p>21 were released from prison.</p> <p>22 A In April?</p> <p>23 Q April 23, 2020.</p> <p>24 A Okay, because I got out in '19. So in April -- I'm</p> <p>25 trying to answer your question, sir. Can I answer it?</p>	<p style="text-align: right;">Page 80</p> <p>1 A Okay. Well, finish.</p> <p>2 Q Because I may -- as I finish my question, I may clear</p> <p>3 up whatever you are going to ask me.</p> <p>4 A Okay. So finish it.</p> <p>5 Q My question to you is that on April 23, 2020, you did</p> <p>6 not have any complaint at that time regarding a</p> <p>7 colostomy reversal problem that was bothering or any</p> <p>8 problems from your prior colostomy. Am I correct in</p> <p>9 that?</p> <p>10 A On April of 2020, when I visited the hospital for a</p> <p>11 sexually transmitted infection, that is what I</p> <p>12 discussed with those people, the sexually transmitted</p> <p>13 infection.</p> <p>14 Q Okay. You did not discuss anything regarding problems</p> <p>15 with your reversal or problems --</p> <p>16 A I had already discussed that prior to that visit with</p> <p>17 my stomach doctor, the one who deals with that.</p> <p>18 Q But I think we're in agreement. Not with these</p> <p>19 people.</p> <p>20 A What people are you talking about?</p> <p>21 Q The people on --</p> <p>22 A What hospital --</p> <p>23 Q McLaren Port Huron.</p> <p>24 A I never discussed anything with them about sexually</p> <p>25 transmitted infection after I had been out of prison.</p>

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<p style="text-align: right;">Page 81</p> <p>1 Q And about a month after that, May 24th of 2020, it</p> <p>2 looks like that is when you're at McLaren Port Huron</p> <p>3 emergency room for your gunshot wound trauma. Does</p> <p>4 that sound familiar?</p> <p>5 A Yes, sir.</p> <p>6 Q And we've talked about the gunshot wound. I'm just</p> <p>7 looking at the record here and you weren't having any</p> <p>8 complaints at that time, you would agree, regarding</p> <p>9 any --</p> <p>10 A No, I wouldn't agree.</p> <p>11 COURT REPORTER: I'm sorry. You have to</p> <p>12 let him finish before you answer.</p> <p>13 THE WITNESS: Like I say, I wasn't having</p> <p>14 no complaints about my colostomy at that time.</p> <p>15 A That's what you were saying, right? That was the</p> <p>16 question.</p> <p>17 BY MR. SCARBER:</p> <p>18 Q It wasn't the question --</p> <p>19 A Finish the question.</p> <p>20 Q And you're doing fine, but the way the depositions</p> <p>21 have to work is I've got to be able to ask the</p> <p>22 question and get the whole question out before you</p> <p>23 give me an answer.</p> <p>24 A Okay.</p> <p>25 Q Even though you might anticipate where I'm going with</p>	<p style="text-align: right;">Page 83</p> <p>1 So my question is, on May 24, 2020, when</p> <p>2 you go to the emergency room, you would agree with me</p> <p>3 that you didn't have any complaints to the emergency</p> <p>4 room folks at that time about a problem with your</p> <p>5 colostomy reversal or your original colostomy. You</p> <p>6 would agree with that; correct?</p> <p>7 A No, I wouldn't agree with you --</p> <p>8 Q Okay. What did you --</p> <p>9 A Because I had -- wait. You cutting me off, sir.</p> <p>10 Q Go ahead. I was wrong. You finish your answer.</p> <p>11 A Okay. There you go.</p> <p>12 I had complaints but during the time</p> <p>13 where I went to the hospital dealing with a gunshot</p> <p>14 wound, that's what I dealt with. I talked to my</p> <p>15 doctor already, Dr. Webber, about the complaints I had</p> <p>16 due to the surgery already. So that's already --</p> <p>17 that's who I discussed that with because he's my</p> <p>18 doctor. When I go to the hospital for emergency</p> <p>19 visits for sexually transmitted infection, gunshot</p> <p>20 wound, I tend to deal with the matter at hand.</p> <p>21 Q Okay.</p> <p>22 A That's all that is.</p> <p>23 Q So I think the answer to my question, then, is, on May</p> <p>24 24, 2020, you did not discuss with them any issues</p> <p>25 regarding your colostomy reversal or your original</p>
<p style="text-align: right;">Page 82</p> <p>1 it or anticipate the last three or four words of what</p> <p>2 my question is going to be, you still got to let me</p> <p>3 finish the question and then you can give me the</p> <p>4 answer.</p> <p>5 A Okay. There you go.</p> <p>6 Q And it becomes an issue only because we can't get</p> <p>7 your whole answer, I can't get my whole question in,</p> <p>8 and then the court reporter can't really get down what</p> <p>9 we're saying.</p> <p>10 A I understand.</p> <p>11 Q So if we ever have to play this back or even play the</p> <p>12 video back, it's going to be so jumbled that it's not</p> <p>13 going to make a lot of sense.</p> <p>14 A I understand.</p> <p>15 Q That's why we've got to do it.</p> <p>16 A Yeah.</p> <p>17 Q But you're going to get an opportunity to say what you</p> <p>18 have to say. Even if I don't cover it, your attorney</p> <p>19 can cover it. I'm just going to ask you the questions</p> <p>20 that I want to ask and then he can follow up and you</p> <p>21 can get out whatever you want to get out that way.</p> <p>22 A Okay. Thank you. I appreciate your patience.</p> <p>23 Q No. It's -- you're doing fine. Very fine.</p> <p>24 A Thank you, sir. So are you.</p> <p>25 Q Thank you.</p>	<p style="text-align: right;">Page 84</p> <p>1 colostomy; correct?</p> <p>2 A Correct.</p> <p>3 Q When was the last time you saw, if you can remember,</p> <p>4 Dr. Webber prior to having the gunshot issue?</p> <p>5 A Sometime in 2019.</p> <p>6 Q Do you remember how many times you saw him after you</p> <p>7 had your colostomy reversal?</p> <p>8 A At least two or three times.</p> <p>9 Q Do you remember the last time you would have seen him?</p> <p>10 Let's say, was it a few months after 2019?</p> <p>11 A It was at the end of the year 2019. I may have seen</p> <p>12 him in 2020 and -- yep, that was it.</p> <p>13 Q And where did you see him when you saw him?</p> <p>14 A At Harper Hospital.</p> <p>15 Q Did he have a separate clinic or something?</p> <p>16 A No. I was going to see him at Harper Hospital. It</p> <p>17 would be the certain part. It would be the floor -- I</p> <p>18 don't know what floor he was on. He had, like, inside</p> <p>19 the hospital, like a little clinic, I would say,</p> <p>20 because it was like a certain floor, and that was his</p> <p>21 office.</p> <p>22 Q When did you get your colostomy reversal?</p> <p>23 A Oh, was it June 2019? Like, the next month after I</p> <p>24 got out they reversed it right away, no problem.</p> <p>25 Q So if you got your reversal in May of 2019 -- if you</p>

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<p style="text-align: right;">Page 85</p> <p>1 got your reversal done in 2019 --</p> <p>2 A Yeah, but not May. June.</p> <p>3 Q I'm sorry -- in June of 2019, you would agree, then,</p> <p>4 that your colostomy was not permanent; correct?</p> <p>5 A See, that's the thing. I felt like when I was in</p> <p>6 prison it was going to be on me forever.</p> <p>7 Q But you would agree with me that ultimately it wasn't</p> <p>8 permanent and --</p> <p>9 A Because they reversed it?</p> <p>10 Q -- and it did get reversed; correct?</p> <p>11 A It did get reversed, yes, sir. I agree with you.</p> <p>12 Q So what you thought was permanent, you would agree</p> <p>13 turned out to not be permanent; correct?</p> <p>14 A Correct. Because it seemed like they was going to</p> <p>15 keep it on me forever when they wouldn't reverse it.</p> <p>16 That's how I felt. Like, if these people don't pay</p> <p>17 for it here, why would they pay for it on the outside</p> <p>18 and I'm in their care? That was my main worry, that I</p> <p>19 was going to have it forever when I was in there.</p> <p>20 Q I'm going to move to strike the last part of your</p> <p>21 answer, just because you had already answered my</p> <p>22 question regarding you would agree with me that it</p> <p>23 wasn't -- it actually turned out that it was not</p> <p>24 permanent like you thought it would be. And that</p> <p>25 is --</p>	<p style="text-align: right;">Page 87</p> <p>1 BY MR. SCARBER:</p> <p>2 Q -- that even though you thought this colostomy was</p> <p>3 going to be permanent, it turns out that it was not</p> <p>4 permanent. Yes or no? You would agree with that;</p> <p>5 correct?</p> <p>6 A Yeah.</p> <p>7 Q Okay. Now, you ultimately did have your colostomy</p> <p>8 reversed and you say you had your procedure done with</p> <p>9 Dr. Webber; correct?</p> <p>10 A Yes, sir.</p> <p>11 Q And when Dr. Webber did the reversal on you, on June</p> <p>12 19th of 2019, did Dr. Webber discuss with you the</p> <p>13 risks that could be associated with the reversal? Yes</p> <p>14 or no?</p> <p>15 A Reversal. Yeah, he told me that all surgeries is</p> <p>16 risky because I'm put under anesthesia. That's what</p> <p>17 he discussed with me. He said it could be bleeding.</p> <p>18 He said that -- yeah, and it could be leakage.</p> <p>19 Q Did Dr. Webber specifically discuss with you that the</p> <p>20 potential risk of the procedure that he was going to</p> <p>21 perform, the colostomy reversal, could be a risk of</p> <p>22 heart attack, stroke, death, infection, the potential</p> <p>23 need for reoperation and the potential for a leak or</p> <p>24 potential for damage surrounding the structures</p> <p>25 including the ureter and -- including your urethra</p>
<p style="text-align: right;">Page 86</p> <p>1 MR. WILLIS: I'll join.</p> <p>2 BY MR. SCARBER:</p> <p>3 Q So let me reask the question, just because I want a</p> <p>4 clean record. You would agree with me, Mr. Jackson,</p> <p>5 that even though you thought the colostomy was going</p> <p>6 to be permanent, turns out that it really wasn't</p> <p>7 permanent and you did ultimately get it reversed;</p> <p>8 correct? Yes or no?</p> <p>9 A Hold on. You got to ask the question again. Ask it</p> <p>10 one more time, sir, please.</p> <p>11 Q Would you agree with me, Mr. Jackson, that even though</p> <p>12 you thought your colostomy was going to be permanent,</p> <p>13 it turns out it actually was not permanent?</p> <p>14 A You talking about when I was in prison and I moved to</p> <p>15 get it reversed and they wouldn't reverse it and I</p> <p>16 felt like that I was going to have the bag forever and</p> <p>17 when I got out I figured that they wouldn't reverse it</p> <p>18 when I got it because they wouldn't do it in prison</p> <p>19 and I was under their care?</p> <p>20 MR. SCARBER: Move to strike as</p> <p>21 nonresponsive.</p> <p>22 BY MR. SCARBER:</p> <p>23 Q I'm going to ask the question again.</p> <p>24 Would you agree with me --</p> <p>25 MR. WILLIS: I'll join.</p>	<p style="text-align: right;">Page 88</p> <p>1 system?</p> <p>2 A Dr. Webber told me that usually when he do this</p> <p>3 surgery, the people that he dealing with be older</p> <p>4 people. He said that I was younger and he said that I</p> <p>5 didn't have any other medical problems, so he said</p> <p>6 that it was potential risk but he said he felt like I</p> <p>7 should be fine.</p> <p>8 Q Okay. Did he discuss with you -- and I'm going to</p> <p>9 move to strike as nonresponsive.</p> <p>10 A Because --</p> <p>11 Q Hang on. Hang on one second. My question for you is,</p> <p>12 did he discuss with you specifically -- and you don't</p> <p>13 have to tell me anything else about why he might have</p> <p>14 discussed certain things or what his opinions were</p> <p>15 about the discussion, whatever. I want to know, did</p> <p>16 he discuss specifically with you that the risk of the</p> <p>17 colostomy reversal could be a heart attack, stroke,</p> <p>18 death, infection, a need for a reoperation, a</p> <p>19 potential for leakage and damage surrounding the body</p> <p>20 parts that -- where he was doing his reversal?</p> <p>21 A Yes. Yeah. He said, "You got a pretty strong heart,</p> <p>22 man, so I'm not worried about a heart attack."</p> <p>23 Q But the question is --</p> <p>24 A You young.</p> <p>25 Q Hang on. Hang on one second.</p>



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<p style="text-align: right;">Page 89</p> <p>1 A Every time I answer the question, you stop me.</p> <p>2 Q Because you answered my question and you said yes, and</p> <p>3 I'm going to move to strike after all that.</p> <p>4 A Okay.</p> <p>5 Q So this is going to be a yes or no question, because I</p> <p>6 need a clean record. Your counsel can come back and</p> <p>7 ask you whatever he wants to ask you and let you</p> <p>8 explain whatever he wants to ask you. That's fine.</p> <p>9 Yes or no. You answered it but I can't</p> <p>10 have another compound answer afterwards. I understand</p> <p>11 that you might want to get something across.</p> <p>12 A I'm just telling you what he said to me.</p> <p>13 Q Did he discuss with you -- yes or no -- this is a yes</p> <p>14 or no question -- that the risk of the procedure could</p> <p>15 be a heart attack, stroke, death, infection, potential</p> <p>16 need for reoperation, and potential for leak or</p> <p>17 potential damage to the surrounding body structures?</p> <p>18 Yes or no?</p> <p>19 A He said that it's always a possibility with surgery</p> <p>20 when you use anesthesia and he said -- yes, he did.</p> <p>21 And he said I should be fine because I have a strong</p> <p>22 heart; I'm a young man.</p> <p>23 Q I'm going to do it this way, because I'm going to end</p> <p>24 up getting the answer to my question. So I'm going to</p> <p>25 give you a record and I want you to read the record.</p>	<p style="text-align: right;">Page 91</p> <p>1 BY MR. SCARBER:</p> <p>2 Q Hang on. Hang on.</p> <p>3 He did discuss with you that there were</p> <p>4 risks associated with this procedure; correct?</p> <p>5 A He told me I was a young man.</p> <p>6 Q Did he discuss with you that there were risks --</p> <p>7 A Can I answer the question?</p> <p>8 Q You've already answered the question in a way that's</p> <p>9 not responsive.</p> <p>10 A I answer how you want me to?</p> <p>11 Q Did he discuss with you that there were risks</p> <p>12 associated with this procedure?</p> <p>13 A He told me that --</p> <p>14 Q Yes or no?</p> <p>15 A I can't --</p> <p>16 Q You said what?</p> <p>17 VIDEOGRAPHER: Your microphone is</p> <p>18 backwards. I can't --</p> <p>19 BY MR. SCARBER:</p> <p>20 Q I'll ask the question again. Did he discuss with you</p> <p>21 that there were risks associated with the procedure?</p> <p>22 A I just answered you, sir. I can't recall.</p> <p>23 Q Okay. You can't recall now?</p> <p>24 A What you mean now?</p> <p>25 Q You just told me before that he discussed risks of the</p>
<p style="text-align: right;">Page 90</p> <p>1 I'm going to come behind you just because I don't have</p> <p>2 a second copy of this thing.</p> <p>3 Let's read the record here. And I'm</p> <p>4 reading page 575 of the DMC records. Can you read</p> <p>5 this particular sentence right here to yourself? No.</p> <p>6 Why don't you read that sentence out loud for me,</p> <p>7 starting with "after."</p> <p>8 A "After patient was made aware" -- "After patient was</p> <p>9 made aware of all risk and benefits of the procedure,</p> <p>10 including the //limited, the risk of heart attack,</p> <p>11 stroke, death, infection, the potential need for</p> <p>12 respiration (sic)" --</p> <p>13 Q Reoperation.</p> <p>14 A -- "reoperation and the potential for a leak,</p> <p>15 potential for damage to the surrounding structures" --</p> <p>16 Q Okay. Stop right there. Do you recall that Dr.</p> <p>17 Webber discussed those particular things with you that</p> <p>18 you just read on the record just now?</p> <p>19 A I don't recall.</p> <p>20 Q You don't know if he discussed those with you?</p> <p>21 A It was a while ago, sir.</p> <p>22 Q But he did discuss with you that there --</p> <p>23 VIDEOGRAPHER: Wait a second. You're not</p> <p>24 wearing your microphone.</p> <p>25 A I don't --</p>	<p style="text-align: right;">Page 92</p> <p>1 procedure with you.</p> <p>2 A I told you Dr. Webber told me with surgery under</p> <p>3 anesthetics it's always risky. That's what -- the</p> <p>4 discussion we had.</p> <p>5 Q Okay.</p> <p>6 A He said I was a young man. I had a strong heart.</p> <p>7 MR. SCARBER: Move to strike.</p> <p>8 BY MR. SCARBER:</p> <p>9 Q Let me ask you this question. This is Dr. Webber's</p> <p>10 record from his operative report. Are you saying that</p> <p>11 if Dr. Webber signed this operative report saying he</p> <p>12 discussed these particular things --</p> <p>13 A Am I saying?</p> <p>14 Q I didn't even finish my question.</p> <p>15 MR. CROSS: Let him finish.</p> <p>16 BY MR. SCARBER:</p> <p>17 Q Are you testifying today that if Dr. Webber prepared</p> <p>18 this record and signed this record and represents that</p> <p>19 this is his medical record, are you telling us that</p> <p>20 Dr. Webber is being untruthful with this medical</p> <p>21 record?</p> <p>22 A I never said anything about Dr. Webber being</p> <p>23 untruthful.</p> <p>24 Q So are you telling us that this record is not true?</p> <p>25 A I'm telling you I don't recall.</p>

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<p style="text-align: right;">Page 93</p> <p>1 Q Okay. You don't recall?</p> <p>2 A I don't recall. I can't tell you that I remember if I</p> <p>3 don't remember. I'm telling you what I do remember</p> <p>4 Dr. Webber saying, about me being a young man and</p> <p>5 having a strong heart.</p> <p>6 Q Move to strike again, at least the last part of your</p> <p>7 response.</p> <p>8 Dr. Webber writes in his record from June</p> <p>9 19, 2019, that -- I'll quote it -- "Male who presented</p> <p>10 originally for evaluation of colostomy reversal. At</p> <p>11 an outside hospital in Port Huron, on December 10,</p> <p>12 2016, he underwent an exploratory laparotomy with</p> <p>13 sigmoid colectomy and Hartmann's procedure for a</p> <p>14 suspected perforated diverticulitis. At that time the</p> <p>15 urologist also did a fix -- did fix his urinary</p> <p>16 bladder as there was an injury to it. He now has no</p> <p>17 issues, end quote.</p> <p>18 That is Dr. Webber's record. Are you</p> <p>19 saying that that record is not true?</p> <p>20 A I didn't say anything.</p> <p>21 Q Do you agree with that record that I just said?</p> <p>22 A What do you mean?</p> <p>23 Q Do you agree with the history that I just read to you?</p> <p>24 A What do you mean?</p> <p>25 Q Do you agree that the statements that I just read to</p>	<p style="text-align: right;">Page 95</p> <p>1 couldn't tell you. You know what I mean?</p> <p>2 Q But my question is to you, do you disagree with</p> <p>3 anything that I just read to you?</p> <p>4 A Do I disagree? Read it again.</p> <p>5 Q Quote, male who presented originally for evaluation of</p> <p>6 colostomy reversal. At an outside hospital in Port</p> <p>7 Huron on December 10, 2016, he underwent an</p> <p>8 exploratory laparotomy with sigmoid colectomy and</p> <p>9 Hartmann's procedure for suspected perforated</p> <p>10 diverticulitis. At that time the urologist did fix</p> <p>11 his urinary bladder and there was an injury to it. He</p> <p>12 now has no issues, end quote.</p> <p>13 Do you disagree with anything that I just</p> <p>14 read there?</p> <p>15 A I don't understand. I don't understand how I would</p> <p>16 disagree with it or agree. I wouldn't say I agree or</p> <p>17 disagree, because I don't know -- you just read some</p> <p>18 stuff -- some medical history on whatever is there. I</p> <p>19 don't know what question you asking me about it.</p> <p>20 Q Do you agree on December 10th you underwent a</p> <p>21 procedure with Dr. Kansakar?</p> <p>22 A I underwent a procedure on December 10th. I agree</p> <p>23 with that. I did do that.</p> <p>24 Q You may not know exactly what it's called; correct?</p> <p>25 A The Hartmann's procedure?</p>
<p style="text-align: right;">Page 94</p> <p>1 you would be true?</p> <p>2 A As far as what? Did Dr. Webber write that?</p> <p>3 Q Not only -- not did he write it, but do you agree that</p> <p>4 those statements that I just read to you, the history,</p> <p>5 the truthfulness of that, do you agree that that is a</p> <p>6 true statement by Dr. Webber?</p> <p>7 A I don't know if it was a true statement, but Dr.</p> <p>8 Webber I know is reading there on that paper.</p> <p>9 Q Okay. Then do you disagree with what I just read to</p> <p>10 you? Disagree that that's not true.</p> <p>11 A I don't know enough about it to disagree or agree.</p> <p>12 Q So you're not saying it's not true; right?</p> <p>13 A I don't know -- what you talking about? What's not</p> <p>14 true?</p> <p>15 Q Are you saying that the record that I just read to</p> <p>16 you, the history from the record that I just read to</p> <p>17 you --</p> <p>18 A The history.</p> <p>19 Q -- is a lie?</p> <p>20 A The history from the record. I'm kind -- that's where</p> <p>21 you're confusing me at. The history from the record.</p> <p>22 What do you mean? Am I saying -- I'm not trying to</p> <p>23 cut you off but I'm trying to get the question more</p> <p>24 clear. Are you saying that am I saying that what you</p> <p>25 have written on that piece of paper is a lie? I</p>	<p style="text-align: right;">Page 96</p> <p>1 Q Yeah.</p> <p>2 A Yes, I do.</p> <p>3 Q Okay. What's your understanding of the Hartmann's</p> <p>4 procedure?</p> <p>5 A I wouldn't have an understanding of it. What do you</p> <p>6 mean?</p> <p>7 Q Well, you said you agree you underwent a Hartmann's</p> <p>8 procedure; correct?</p> <p>9 A Yes.</p> <p>10 Q Okay. You agree that the urologist fixed your urinary</p> <p>11 bladder at that time?</p> <p>12 A Yes.</p> <p>13 Q You would agree that you presented for a colostomy</p> <p>14 reversal with Dr. Webber?</p> <p>15 A Yes, sir.</p> <p>16 Q You would agree that at the time you presented for the</p> <p>17 colostomy reversal with Dr. Webber you weren't having</p> <p>18 any issues with the colostomy, colostomy reversal --</p> <p>19 A Hold on.</p> <p>20 Q So let me ask the question again. You would agree</p> <p>21 that as to the colostomy itself, at the time of your</p> <p>22 surgical procedure with Dr. Webber, you weren't having</p> <p>23 any physical problems with the colostomy at that</p> <p>24 point; correct?</p> <p>25 A You kind of confusing. Can I explain to you -- ask</p>



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<p style="text-align: right;">Page 97</p> <p>1 you what the question was and then you tell me --</p> <p>2 Q Let me try to ask it again.</p> <p>3 A Okay.</p> <p>4 Q When you presented for the colostomy --</p> <p>5 A When I presented for. That's what I'm asking. When I</p> <p>6 presented for. What do you mean, present?</p> <p>7 Q When you were getting ready to undergo your colostomy</p> <p>8 reversal with Dr. Webber --</p> <p>9 A Okay.</p> <p>10 Q -- you would agree with me that particular time, prior</p> <p>11 to you getting ready to undergo your procedure with</p> <p>12 him for the colostomy reversal, you weren't having any</p> <p>13 physical issues with the colostomy that was in place</p> <p>14 at that particular time; correct?</p> <p>15 A I had been -- I had been having -- since I had the</p> <p>16 colostomy I had been having, you know, different</p> <p>17 little cramping or whatever, but -- you know what I'm</p> <p>18 saying? That's all I can say. I'd been having that</p> <p>19 since prison.</p> <p>20 Q So you had some cramping; correct?</p> <p>21 A Uh-huh.</p> <p>22 Q But that's all you can recall?</p> <p>23 A Uh-huh.</p> <p>24 Q And if he indicates in his records or in his testimony</p> <p>25 that you were not having any particular issues at that</p>	<p style="text-align: right;">Page 99</p> <p>1 having the same pain in my stomach and I told Dr.</p> <p>2 Webber after the reversal. He looked at it and said</p> <p>3 it may be a hernia. So that's why I'm --</p> <p>4 Q Did he ever tell you you actually had a hernia?</p> <p>5 A He didn't say actually you have a hernia but he said</p> <p>6 it was a suspected hernia and it's in the records.</p> <p>7 Q What records are you referring to?</p> <p>8 A The last visit I had at Harper Hospital, that's what</p> <p>9 we talked about.</p> <p>10 Q Can you get the records out that you're talking about?</p> <p>11 You just said it's in the records.</p> <p>12 A I'm for sure it is. I have been there. I went there</p> <p>13 and that's what we talked about. I don't have the</p> <p>14 records that I could get out, but they --</p> <p>15 MR. CROSS: I believe we've given you</p> <p>16 guys all the records.</p> <p>17 MR. SCARBER: Can I see the records he's</p> <p>18 reviewed and what he's talking about? He said he</p> <p>19 reviewed something over the weekend.</p> <p>20 THE WITNESS: I didn't say that. I</p> <p>21 didn't say that.</p> <p>22 BY MR. SCARBER:</p> <p>23 Q I thought you said you reviewed something in</p> <p>24 preparation for your deposition over the weekend and</p> <p>25 that it was medical records.</p>
<p style="text-align: right;">Page 98</p> <p>1 particular time from a medical standpoint, would you</p> <p>2 agree with him?</p> <p>3 A What you mean? If he --</p> <p>4 Q If his reports --</p> <p>5 A Nah, I can't even agree with his report, if I was. I</p> <p>6 told you I was having cramping just now.</p> <p>7 Q Cramping?</p> <p>8 A Yes.</p> <p>9 Q Okay. Describe the cramping you were having.</p> <p>10 A Like, sharp pains. Because I believe --</p> <p>11 Q Just describe --</p> <p>12 A It's just a sharp pain.</p> <p>13 Q Sharp pain.</p> <p>14 A Yeah.</p> <p>15 Q Where was the sharp pain?</p> <p>16 A On my right side of my abdominal. Because I went to</p> <p>17 go see Dr. Webber and he said it could possibly be a</p> <p>18 hernia.</p> <p>19 Q Was it a hernia, that you know of?</p> <p>20 A I believe it is. I'm afraid of getting cut back open</p> <p>21 right now, recently, at this time. Dr. Webber</p> <p>22 discussed with me if it was a hernia, he have to cut</p> <p>23 it out. But that's the same problems I was having</p> <p>24 before the reversal. Like, the same exact pain I was</p> <p>25 having in prison. I told the people in prison I was</p>	<p style="text-align: right;">Page 100</p> <p>1 A Okay. I never said nothing about me reviewing over</p> <p>2 the weekend Dr. Webber talking to me about my hernia.</p> <p>3 I didn't say that. I never --</p> <p>4 Q Let me wait for your attorney.</p> <p>5 VIDEOGRAPHER: Want to go off the record?</p> <p>6 MR. SCARBER: We can go off the record.</p> <p>7 VIDEOGRAPHER: We are going off the</p> <p>8 record. It's 2:09 p.m.</p> <p>9 (Whereupon, a recess was held.)</p> <p>10 - - -</p> <p>11 VIDEOGRAPHER: We are back on the record.</p> <p>12 It is 2:17 p.m.</p> <p>13 BY MR. SCARBER:</p> <p>14 Q Okay. We took a brief intermission, Mr. Jackson. You</p> <p>15 had referenced something about having a subsequent</p> <p>16 visit with Dr. Webber, maybe in the fall or August or</p> <p>17 sometime in 2019.</p> <p>18 A Yes.</p> <p>19 Q Neither your counsel nor I have that record nor does</p> <p>20 cocounsel for the other defendants in this case.</p> <p>21 A Because it was --</p> <p>22 Q So what we're going to do is, I'm going to move on</p> <p>23 from that part of this. If we get that record, we'll</p> <p>24 reserve the right to come back and ask questions about</p> <p>25 it.</p>

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<p style="text-align: right;">Page 101</p> <p>1 A Okay.</p> <p>2 Q Obviously, we're not saying you're lying. We're just</p> <p>3 saying we don't have it, and since we don't have it,</p> <p>4 we can't really cross-examine you about what happened.</p> <p>5 That's what I'm saying. Because you're testifying</p> <p>6 from your memory and I don't have anything to verify</p> <p>7 whatever it is you're saying, to ask you about, like I</p> <p>8 have these records. So I'm going to move on and let</p> <p>9 me just --</p> <p>10 A Because you all usually -- by being Dr. Webber's</p> <p>11 clinic --</p> <p>12 Q It's possible that maybe this is in a different area</p> <p>13 or different record than what we have.</p> <p>14 A Okay. Thank you.</p> <p>15 Q And the three of us, we'll work on trying to figure</p> <p>16 out if there is something else -- if there's something</p> <p>17 else, and then we'll try to obtain it and follow up on</p> <p>18 it.</p> <p>19 A Okay.</p> <p>20 Q But you've already indicated to me, at least what</p> <p>21 occurred, I believe, leading up to your visit with Dr.</p> <p>22 Webber.</p> <p>23 So how many visits did you have with Dr.</p> <p>24 Webber before he did his surgery on you in June of</p> <p>25 2019?</p>	<p style="text-align: right;">Page 103</p> <p>1 Q And you don't dispute that you signed such consent</p> <p>2 forms prior to having the surgery?</p> <p>3 A No, I don't dispute that.</p> <p>4 Q And you also agree that you would have signed consent</p> <p>5 forms prior to you having the original colostomy back</p> <p>6 in 2016 with Dr. Kansakar?</p> <p>7 A Yeah. I signed consent forms with Dr. Kansakar. And</p> <p>8 that's the thing, because they told me the bag was</p> <p>9 going to come off in two months.</p> <p>10 Q My question is, did you -- and we can get to that or</p> <p>11 your counsel can get to that -- but my question is --</p> <p>12 A But I'm trying to figure out did I sign something that</p> <p>13 said the bag was going to come off.</p> <p>14 Q That's not what I'm asking. I'm not asking you that.</p> <p>15 A Okay.</p> <p>16 Q What I'm asking is, you would agree that prior to her</p> <p>17 performing the surgery you would have signed consent</p> <p>18 forms basically saying I understand that there are</p> <p>19 risks that would be associated with this particular</p> <p>20 procedure and those risks can be infection, bleeding,</p> <p>21 loss of sensation, some paralysis, death. You</p> <p>22 understand that those were risks that were associated</p> <p>23 and you had to sign off on that before you had the</p> <p>24 surgery; correct?</p> <p>25 A Yeah, I signed that paper.</p>
<p style="text-align: right;">Page 102</p> <p>1 A I believe it was maybe two but I can't recall for</p> <p>2 sure.</p> <p>3 Q At the time you saw Dr. Webber in June of -- in the</p> <p>4 time -- in those times prior to the June 2019 reversal</p> <p>5 surgery, was your colostomy at that point functional,</p> <p>6 meaning that it worked and you were able to use it?</p> <p>7 A Yes, sir.</p> <p>8 Q And you would agree that it was functional at least up</p> <p>9 until the time he performed the surgery on you in June</p> <p>10 of 2019?</p> <p>11 A Yes, sir.</p> <p>12 Q If the -- do you recall that you would have signed any</p> <p>13 consent forms concerning the surgery that he performed</p> <p>14 on you? Let me --</p> <p>15 A Do I recall if I signed any?</p> <p>16 Q Yes.</p> <p>17 A I'm sure I did.</p> <p>18 Q And you understand that when you signed a consent form</p> <p>19 prior to someone performing a surgery on you, that's</p> <p>20 basically where you are acknowledging that there are</p> <p>21 potential risks that could happen, bad things that</p> <p>22 might go wrong, and you're just indicating that you</p> <p>23 have an understanding that there are risks and</p> <p>24 something could happen; correct?</p> <p>25 A Correct.</p>	<p style="text-align: right;">Page 104</p> <p>1 Q Okay. Now, when you came to the MDOC in March of 2017</p> <p>2 from the jail, it's my understanding from your prior</p> <p>3 testimony that when you had gotten to the jail -- I'm</p> <p>4 sorry -- when you had gotten to the prison, that your</p> <p>5 stoma site had healed up at that point; correct?</p> <p>6 A As far as me not needing the rings?</p> <p>7 Q Yes.</p> <p>8 A And it was a flat flush, yeah, more so.</p> <p>9 Q So when you got to the prison, then, you were able to</p> <p>10 use the paste at that point; correct?</p> <p>11 A Yes, sir, I was able to use the paste.</p> <p>12 Q And it's my understanding from having reviewed some of</p> <p>13 the records in this case that when you arrived at the</p> <p>14 prison you were very upset that you had not had your</p> <p>15 reversal done in February of 2017; correct?</p> <p>16 A I was more so hurt than upset.</p> <p>17 Q And you conveyed your dissatisfaction with the jail</p> <p>18 when you came to prison; correct?</p> <p>19 A What do you mean? I just explained that the fact that</p> <p>20 I was in the prison's care and they didn't reverse my</p> <p>21 bag, I felt like I was going to have to keep it.</p> <p>22 Q No. My question is when you came to the prison in</p> <p>23 March of 2017 --</p> <p>24 MR. WILLIS: You're breaking up here. I</p> <p>25 can't hear anything that you're saying. Sorry.</p>

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<p style="text-align: right;">Page 105</p> <p>1 THE WITNESS: Who? Me? Who you talking</p> <p>2 about?</p> <p>3 MR. WILLIS: Yes, yes, the witness.</p> <p>4 MR. SCARBER: Okay. Let me reask the</p> <p>5 question again.</p> <p>6 THE WITNESS: Can you hear me now? You</p> <p>7 can hear me clearly?</p> <p>8 MR. WILLIS: I can now.</p> <p>9 BY MR. SCARBER:</p> <p>10 Q My question was, when you had come to the jail -- when</p> <p>11 you had left the jail in March of 2017 and had come to</p> <p>12 the prison, you were expressing concerns at that</p> <p>13 point --</p> <p>14 A About having the bag forever?</p> <p>15 Q -- about having problems with the jail and you not</p> <p>16 being able to have your colostomy reversal while you</p> <p>17 were in jail; correct?</p> <p>18 A I was discussing that with who?</p> <p>19 Q With the medical staff that worked for the jail.</p> <p>20 A Oh, yeah, yeah. I definitely made them aware.</p> <p>21 Q And at that point you were already talking about</p> <p>22 potentially filing a lawsuit even when you originally</p> <p>23 came to the prison; correct?</p> <p>24 A Yes.</p> <p>25 Q Okay.</p>	<p style="text-align: right;">Page 107</p> <p>1 correct?</p> <p>2 A When I got there to the prison, they didn't have the</p> <p>3 correct colostomy -- the patches. They didn't have</p> <p>4 the correct patches that I needed to fit my stoma.</p> <p>5 And when you don't have the correct patches to fit</p> <p>6 your stoma, then your feces get packed all around.</p> <p>7 The rest, it doesn't come straight out in the back.</p> <p>8 It comes out and gets packed around your skin. So</p> <p>9 when I first came to the jail -- when I came to RGC,</p> <p>10 or whatever, they didn't have the correct size for me.</p> <p>11 Q Okay. Did they ultimately order the correct size for</p> <p>12 you?</p> <p>13 A Yeah. It took about two weeks before they got them.</p> <p>14 Q Okay.</p> <p>15 A So during that time, you know, I had a lot of issues</p> <p>16 with the bag -- with the smelling, with the stuff</p> <p>17 being packed around the edges. It wasn't sealing up.</p> <p>18 The bag even came off on me before -- you know, while</p> <p>19 I was out in the yard I had feces all over me and the</p> <p>20 guys were looking at me crazy.</p> <p>21 Q Let me ask you this: You're talking about when you</p> <p>22 first came in there during that two-week period?</p> <p>23 A Yes.</p> <p>24 Q Okay. Now, after the two-week period is up, though,</p> <p>25 they end up ordering the correct supplies; correct?</p>
<p style="text-align: right;">Page 106</p> <p>1 A When I came to the prison, I was talking about filing</p> <p>2 a lawsuit because of the fact that they didn't reverse</p> <p>3 my colostomy bag because Ms. Colleen got mad at me</p> <p>4 because I deflated my catheter and she told me that --</p> <p>5 when I talked to her about my reversal, that it was a</p> <p>6 financial problem and it had been postponed.</p> <p>7 Q When you came to the -- to the jail -- I'm sorry -- to</p> <p>8 the prison in March of 2017, you actually saw somebody</p> <p>9 about your reversal; correct?</p> <p>10 A No.</p> <p>11 Q I'm sorry. I'm sorry. Let me strike my question.</p> <p>12 Let me ask it again.</p> <p>13 When you came to the prison in 2017 of</p> <p>14 March, they actually did an assessment on you. You</p> <p>15 would agree with that?</p> <p>16 A Assessment, yeah.</p> <p>17 Q You told them that you were having -- that you had a</p> <p>18 colostomy.</p> <p>19 A Uh-huh.</p> <p>20 Q They knew you had a colostomy.</p> <p>21 A Yes, sir.</p> <p>22 Q They performed X-rays on you and labs and everything.</p> <p>23 Do you recall that?</p> <p>24 A Yes, sir.</p> <p>25 Q They ordered colostomy supplies for you at that point;</p>	<p style="text-align: right;">Page 108</p> <p>1 A No. They ordered the correct supplies that time but</p> <p>2 they also had wrong supplies throughout the whole time</p> <p>3 I was there. They would run out and I would have to</p> <p>4 make do with what they had. Like, one particular time</p> <p>5 I went to health care and they had a different brand</p> <p>6 of bags but -- you know, then the patches, and it kind</p> <p>7 of fit. It looked like it fit it but after, like, a</p> <p>8 couple of minutes it would, like, ease itself off.</p> <p>9 The bag would ease itself off the patch. And the bag</p> <p>10 came off on me then in the yard.</p> <p>11 Q Do you remember what particular time period we're</p> <p>12 talking about? I do have something that --</p> <p>13 A Yeah.</p> <p>14 Q Okay. You go ahead. I'm sorry.</p> <p>15 A I remember one specific time when I moved from Jackson</p> <p>16 to St. Louis and I got there and they didn't even have</p> <p>17 none of my supply. They gave me a hole patch for</p> <p>18 somebody else. Like, the hole was, like, way big.</p> <p>19 This is, like, this fit somebody else. They didn't</p> <p>20 have my bags. It was like a lot of times when they</p> <p>21 wouldn't have my bags and I would just rinse the bags</p> <p>22 out and just wash them. They're disposable but you</p> <p>23 supposed to be able to rinse them out, but I would,</p> <p>24 like, rinse them out and have them for, like, a week</p> <p>25 or two. You know what I mean? Because they wouldn't</p>

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<p style="text-align: right;">Page 109</p> <p>1 have the supplies at the right time. Yeah.</p> <p>2 Q I have that you got to the prison on March 23, 2017,</p> <p>3 and per the records an order for colostomy supplies</p> <p>4 was immediately put in for you.</p> <p>5 A Yeah, but when --</p> <p>6 Q Let -- I've got to ask the question.</p> <p>7 A Okay.</p> <p>8 Q And then I have that you picked up colostomy supplies</p> <p>9 on March 31st of 2017.</p> <p>10 A March the 31st of 2017. Yeah. I had to wait on them.</p> <p>11 I was there without supplies a week or two.</p> <p>12 Q You didn't have any supplies when you got there?</p> <p>13 A I had to make do with what I had on. I'm talking</p> <p>14 about the bag that I had on when I got to the jail.</p> <p>15 Q So -- okay.</p> <p>16 A And then they gave me the supplies that were improper,</p> <p>17 because that's what they had at the prison. I had to</p> <p>18 wait for them to order them, but the whole time I was</p> <p>19 waiting on them to order them, I didn't have the right</p> <p>20 stuff. My stuff leaked. It would leak, it would</p> <p>21 smell, because it would get worn out. You know what I</p> <p>22 mean?</p> <p>23 Q Right.</p> <p>24 A It was disposable.</p> <p>25 Q And then they ended up getting the supplies, you said,</p>	<p style="text-align: right;">Page 111</p> <p>1 (Whereupon, a recess was held.)</p> <p>2 - - -</p> <p>3 VIDEOGRAPHER: We are back on the record.</p> <p>4 It is 2:35 p.m.</p> <p>5 BY MR. SCARBER:</p> <p>6 Q Mr. Jackson, we were talking about the supplies that</p> <p>7 you were receiving. I have another record of 4/7 --</p> <p>8 of April 7th of 2017 where it indicates that you</p> <p>9 picked up colostomy supplies as well. And you may not</p> <p>10 remember all of these exact dates, but let me ask you</p> <p>11 a question. Would it be fair to say that over the</p> <p>12 course of your time at the Michigan Department of</p> <p>13 Corrections that you would have picked up colostomy</p> <p>14 supplies sometimes on a twice a month or at least a</p> <p>15 monthly basis? Would you agree with that?</p> <p>16 A Uh-huh. When they had the right ones, yes.</p> <p>17 Q You're not saying that you think that somebody --</p> <p>18 let's say they had the wrong thing or you needed a</p> <p>19 different supply. You're not saying that they were</p> <p>20 intentionally trying to give you some kind of bad</p> <p>21 supply or something like that. What you're saying is</p> <p>22 that they either ordered the wrong thing or they</p> <p>23 didn't have it or they gave you something that didn't</p> <p>24 work; right?</p> <p>25 A I don't know, but I assume.</p>
<p style="text-align: right;">Page 110</p> <p>1 about two weeks later; correct?</p> <p>2 A I can't tell you exact time because I don't want to --</p> <p>3 you know what I'm saying? I don't know exact but I</p> <p>4 know it wasn't that same day or two. I had to go</p> <p>5 without. You know what I mean?</p> <p>6 Q My only question is -- and I think you testified -- I</p> <p>7 don't want to backtrack over what we already covered,</p> <p>8 but my only question is -- I think we talked about</p> <p>9 that point and you said they ended up ordering it and</p> <p>10 you got the stuff about a couple weeks later. Right?</p> <p>11 A And then they ran out again and I had to do the same</p> <p>12 thing, when they ran out again.</p> <p>13 Q Then my question for you is: I have that throughout</p> <p>14 your stay --</p> <p>15 MR. WILLIS: The screen is cutting out</p> <p>16 and it's hard to -- I can't hear anything.</p> <p>17 MR. SCARBER: It's not your fault.</p> <p>18 VIDEOGRAPHER: Connection. I'm sure it's</p> <p>19 the bandwidth.</p> <p>20 Here. Yeah. You want to go off? I</p> <p>21 can't do it while we're --</p> <p>22 MR. SCARBER: We got to fix it, Ken, so</p> <p>23 we'll stop for a second.</p> <p>24 VIDEOGRAPHER: We're going off the</p> <p>25 record. It is 2:32 p.m.</p>	<p style="text-align: right;">Page 112</p> <p>1 Q You assume what?</p> <p>2 A I don't know what happened, but I assume that's what</p> <p>3 happened. I can't tell you what happened. I can't</p> <p>4 guess.</p> <p>5 Q You don't --</p> <p>6 A I don't know what happened with the supply. I'm just</p> <p>7 telling you what happened. I can't say whether they</p> <p>8 intentionally or not. I don't know. I just tell you</p> <p>9 what happened.</p> <p>10 Q But you're not alleging that somehow there was some</p> <p>11 kind of conspiracy to give you the wrong supplies or</p> <p>12 anything like that; right? You're just saying that</p> <p>13 sometimes some things didn't work and you had to get</p> <p>14 something different; correct?</p> <p>15 A Yeah. I mean, I never said it was conspiracy in the</p> <p>16 first place. I don't know what you mean. I'm just</p> <p>17 telling you the facts. They didn't have my supplies a</p> <p>18 lot of times and I had to make do with the supplies</p> <p>19 that didn't fit and leaked on me sometime.</p> <p>20 Q Okay. But not all the time but --</p> <p>21 A Not all the time, no.</p> <p>22 Q And you're not saying that they deliberately said,</p> <p>23 "Oh, here comes Mr. Jackson. Let's give him the wrong</p> <p>24 supplies" or something like that; right? Or "let's</p> <p>25 give him something that doesn't work." Right?</p>



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<p style="text-align: right;">Page 113</p> <p>1 A I don't know. I can't speak for other people.</p> <p>2 Q But you're not alleging that they somehow did that;</p> <p>3 right?</p> <p>4 A I can't speak for other people. I don't know why they</p> <p>5 did or what they did.</p> <p>6 Q I know you can't speak --</p> <p>7 A It's just I don't know. That's the answer: I don't</p> <p>8 know.</p> <p>9 Q Okay. But we're in a lawsuit and I'm just trying to</p> <p>10 make sure that you're not saying that somehow they --</p> <p>11 A I don't know.</p> <p>12 Q -- they somehow said, "Let's make sure we give Mr.</p> <p>13 Jackson the wrong supplies or give him something that</p> <p>14 doesn't work for him." Right?</p> <p>15 A I don't know what they did for -- that's all. I don't</p> <p>16 know. I'm not saying anything. I don't know.</p> <p>17 Q Well, now is the time I've got to ask you. Do you</p> <p>18 have any proof as we sit here today that somehow one</p> <p>19 of the nurses somehow said, "Let's make sure" --</p> <p>20 A You're talking about Nurse Colleen?</p> <p>21 Q No.</p> <p>22 A You said one of the nurses.</p> <p>23 Q I didn't even finish. My question is -- I'm talking</p> <p>24 about the prison at this point. From March 23, 2017</p> <p>25 forward. You're not claiming that somehow one of the</p>	<p style="text-align: right;">Page 115</p> <p>1 Q Okay. But for the jail you've got a specific</p> <p>2 allegation that you think somebody deliberately did</p> <p>3 something to you to stop you from getting the surgery.</p> <p>4 Am I correct? You just said that.</p> <p>5 A Yes.</p> <p>6 Q But for the MDOC people -- that's what I'm getting at.</p> <p>7 A Okay.</p> <p>8 Q The MDOC people, do you have that same kind of</p> <p>9 evidence or did you have that same kind of</p> <p>10 conversation with somebody where they deliberately</p> <p>11 said, "I'm going to stop you from getting your</p> <p>12 supplies" or I'm going to stop you from being able to</p> <p>13 have a bag for a few days or an extra week," or</p> <p>14 something like that?</p> <p>15 MR. WILLIS: Objection to form on that</p> <p>16 one. Go ahead.</p> <p>17 BY MR. SCARBER:</p> <p>18 Q Answer the question.</p> <p>19 A I didn't have no conversation with no one about that.</p> <p>20 Q Okay. So you're not going to come back next month or</p> <p>21 in a couple of weeks and say, "Oh, by the way, one of</p> <p>22 these people told me that they were trying to never</p> <p>23 give me a bag and trying to make my life miserable</p> <p>24 because of the colostomy." Right?</p> <p>25 A I can't say that.</p>
<p style="text-align: right;">Page 114</p> <p>1 nurses in the prison specifically said, "Here comes</p> <p>2 Mr. Jackson. I'm going to deliberately try to give</p> <p>3 him the wrong kind of supply for his colostomy."</p> <p>4 A I can't say -- what do you mean?</p> <p>5 Q Well --</p> <p>6 A I can't speak for other people. That's what I'm</p> <p>7 telling you. I don't know why they ran out of my</p> <p>8 supplies. Why they didn't have them. I do not know.</p> <p>9 That's all I'm telling you. I can't answer nothing I</p> <p>10 don't know. That's it.</p> <p>11 Q But I guess for my purposes for the deposition, then,</p> <p>12 for the lawsuit, if you're claiming that somehow one</p> <p>13 of the nurses or one of the health professionals</p> <p>14 specifically told -- specifically came up with some</p> <p>15 idea not to give you correct supplies intentionally or</p> <p>16 something like that, I need to know that that's what</p> <p>17 you're claiming.</p> <p>18 A Okay. I got you. I'm claiming that Nurse Colleen</p> <p>19 intentionally cancelled my surgery, my reversal.</p> <p>20 That's what I'm claiming. She cancelled my surgery.</p> <p>21 She intentionally did. Because when I asked her about</p> <p>22 it, she said that it was postponed for financial</p> <p>23 reasons.</p> <p>24 Q Okay. But I'm talking about the MDOC now.</p> <p>25 A Okay. I don't know why they ran out of supplies.</p>	<p style="text-align: right;">Page 116</p> <p>1 Q Well, I need --</p> <p>2 MR. CROSS: Just answer his question.</p> <p>3 A I'm saying I don't know how to answer. You're saying</p> <p>4 I'm not going to tell you because I never said that --</p> <p>5 I never said that. What do you mean?</p> <p>6 BY MR. SCARBER:</p> <p>7 Q I got it. I just want to make sure you're not saying</p> <p>8 that. That's why I'm here, to kind of figure out --</p> <p>9 A You want to --</p> <p>10 Q I'm here to figure out and make sure that --</p> <p>11 A My answer to the question is I don't know why the</p> <p>12 people not giving me the bags and the supplies that I</p> <p>13 needed.</p> <p>14 Q Okay.</p> <p>15 A And that was my answer to the question.</p> <p>16 Q And I think I got your answer. So if you don't know,</p> <p>17 then you're not claiming that --</p> <p>18 A I'm just saying I don't know.</p> <p>19 Q But if you're claiming --</p> <p>20 A I don't mean to laugh.</p> <p>21 Q My job is to kind of come here and figure out what</p> <p>22 your claim is, as well as that's what Mr. Willis is</p> <p>23 trying to do, too. That's a part of what we're doing.</p> <p>24 So if you were claiming that you had a</p> <p>25 conversation with somebody from the MDOC and they told</p>

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<p style="text-align: right;">Page 117</p> <p>1 you "We're not going to give you your bag" or "We're 2 going to make life miserable for you," or "We are 3 intentionally or deliberately not going to give you 4 some supplies or mess up an order" or something like 5 that, that's what I need to know. Do you have any 6 evidence or any specific claim like that? 7 A What do you mean? Do I have any specific claim or any 8 evidence that someone in MDOC said they was going to 9 specifically not give me my stuff that I needed? I 10 never said that. What do you mean? I didn't say 11 that. 12 Q But you're not claiming that. That's what I'm getting 13 at. Right? 14 A I don't know. It's kind of -- you kind of confusing 15 me. 16 Q You never said anything like that; correct? 17 A What do you mean? You got to be specific before I say 18 yes. 19 Q You just answered the question and said you never said 20 anything like somebody from the MDOC was doing 21 anything like that; correct? 22 A No. I said that I never said nothing like that. 23 Like, I never said -- I never said that I said 24 somebody from MDOC was not doing nothing correct. I 25 didn't say that. That's not what I answered the</p>	<p style="text-align: right;">Page 119</p> <p>1 lot of times they didn't have them and I had to make 2 do. I still wasted stuff on my butt when I didn't 3 have the right supplies. But nobody specifically 4 said, "Hey, we're not going to give you the right 5 supplies." Is that the question? 6 Q That's what I'm asking you. 7 A Okay. There you go. 8 Q Okay. 9 A Nobody told me that, like, "I'm not going to give you 10 the right supplies," purposely. I'm not saying that's 11 the reason why they didn't have them. 12 Q Listen. 13 A You know what I mean? 14 Q But I've got cut to you off, because once you answer 15 the question, I've got to move on. That's why I keep 16 coming back, because it's, like, you're giving me an 17 answer -- I think I got your answer -- and then you 18 say something after it and then I have to go back and 19 make sure I actually thought I was thinking correctly 20 that you answered the question. 21 A Yeah, yeah. Makes perfect sense. 22 Q So once you answer the question... 23 Who gave you your supplies when you were 24 in MDOC? 25 A Health care.</p>
<p style="text-align: right;">Page 118</p> <p>1 question for. I said that I never said that someone 2 intentionally didn't give me my bags or whatever. I 3 didn't say that. I'm not agreeing. I'm saying I 4 don't know why they didn't give them to me. That's 5 what I said. 6 Q Okay. So as we sit here today can you tell me any 7 specific instance where something like that happened 8 that you're aware of? 9 A Uh-huh. Yes. 10 Q That the MDOC specifically told you they weren't 11 giving you something deliberately to harm you or cause 12 you any kind of problem like that? 13 A No. What you mean? Nobody never said I'm not giving 14 it to you so I can cause you problems. No one ever 15 said that. They just did it, at the jail. You know 16 what I mean? 17 Q Okay. I got you. You're talking about before you got 18 to the MDOC. 19 A Yeah, yeah, yeah. Oh, you talking about when I got to 20 the MDOC, did anybody say -- whatever -- they told me 21 that they wouldn't give me my reversal surgery. 22 Q I'm not talking about that. 23 A When I got to the MDOC. But that was it. 24 Q Okay. Just the reversal surgery. 25 A And when it was time for me to go get my supplies, a</p>	<p style="text-align: right;">Page 120</p> <p>1 Q Was it a nurse that gave it to you? 2 A It was always a nurse, or someone working down in 3 health care. 4 Q Do you remember any of the nurses at MDOC? 5 A Uh-uh. 6 Q I have a note that in December of 2017 you had advised 7 the health care people at the MDOC that they were 8 giving you a Hollister bag and you wanted the ConvaTec 9 bag or something like that. 10 A Oh, that's what I was talking about. 11 Q Let me -- I've got to ask the question, though. 12 A There we go. Go ahead. 13 Q Now, I have that this -- 14 A It was ConvaTec and the what? 15 Q And there was a Hollister. 16 A You're talking about when they gave me the Hollister 17 patch and the ConvaTec bag and I had to make it work? 18 Q But I've got to finish asking the question. 19 A Okay. 20 Q There's a note from the MDOC records where it 21 indicates that -- it says that you came to pick up 22 some colostomy supplies. You were issued a box of 23 colostomy drainage pouches, but the prisoner brand and 24 stock number are not available, so they found an 25 equivalent pouch that worked with the same wafer that</p>



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<p style="text-align: right;">Page 121</p> <p>1 you had used.</p> <p>2 A Right.</p> <p>3 Q Does that sound about what you were trying to</p> <p>4 describe?</p> <p>5 A Yes, sir.</p> <p>6 Q So it sounds like something happened with an order and</p> <p>7 they tried to give you something that they thought</p> <p>8 would work for a period of time until they could get</p> <p>9 the specific one you wanted. Does that sound right?</p> <p>10 A No, it doesn't. What happened was, when I would go</p> <p>11 down there they wouldn't have my supplies so they</p> <p>12 would give me anything they had in the back and try to</p> <p>13 make it fit. And that's what they did. And there was</p> <p>14 no choice that I had. Once they gave it to me, it</p> <p>15 was, like, they don't have them, so what do I do?</p> <p>16 Either I try this or I try nothing.</p> <p>17 Q I have something on -- I have a record on December 11,</p> <p>18 2017. This is from the MDOC record, page 1. And it</p> <p>19 says that "The inmate arrived for a scheduled nurse</p> <p>20 visit to pick up colostomy supplies. He was given the</p> <p>21 usual ConvaTec wafers, however the usual ConvaTec</p> <p>22 wafers" -- "the usual ConvaTec bags were not available</p> <p>23 at that time so he was given ten of the Hollister bags</p> <p>24 after it was discovered that they fit into the</p> <p>25 ConvaTec flange. He was also given stoma feces paste,</p>	<p style="text-align: right;">Page 123</p> <p>1 all.</p> <p>2 Q So you thought it fit at first. You thought it</p> <p>3 worked. It ended up not working. Then they ordered</p> <p>4 another bag for you that you wanted and it ultimately</p> <p>5 came and then you were able to use that bag that you</p> <p>6 originally wanted. Right?</p> <p>7 A Yeah.</p> <p>8 Q Okay. That's what I was asking.</p> <p>9 A Yeah, yeah. It was like --</p> <p>10 Q I don't want to -- if you keep -- so the question is</p> <p>11 off the table at that point.</p> <p>12 A Okay. There you go.</p> <p>13 Q You ended up getting into a fight on January the 5th</p> <p>14 or somewhere around January of 2018 at the prison;</p> <p>15 correct?</p> <p>16 A Yes, with my bunkie. Yeah, that's what it was. See,</p> <p>17 what happened with that was my bunkie -- I had a lot</p> <p>18 of problems with people everywhere I went because of</p> <p>19 the bag. When I was in prison -- like, guys in the</p> <p>20 cube -- I was in an eight-man cubicle -- like, when I</p> <p>21 come in and they're first meeting me and they didn't</p> <p>22 know I have a bag, everything be fine. Then once they</p> <p>23 get to smelling the bag, everybody had a problem with</p> <p>24 me.</p> <p>25 I got into, actually, a fight with my</p>
<p style="text-align: right;">Page 122</p> <p>1 barrier wipes and adhesive removal while he expressed</p> <p>2 thanks and exited the clinic without incident." Does</p> <p>3 that sound correct?</p> <p>4 A Yes. That's the time when I was telling you that the</p> <p>5 bag would come off, because it appeared like it fit,</p> <p>6 but once you put it on, like, less than, like a couple</p> <p>7 minutes it would squeeze itself off and I had to deal</p> <p>8 with that for almost two weeks. The bag came off on</p> <p>9 me on the yard and I got feces all over my clothes</p> <p>10 when I was in the weight pit, and I missed chow.</p> <p>11 Because I had to go back to shower -- you know, right</p> <p>12 after weight pit I had to shower. I missed chow a</p> <p>13 couple of times, yeah, because of that.</p> <p>14 Q Okay. Now I've got a follow-up note. That note was</p> <p>15 from the 11th of December 2017. Then I have a</p> <p>16 follow-up note from January of 2018, January 5th, and</p> <p>17 it says that they just received the bags that the</p> <p>18 patient is asking for from the warehouse. They called</p> <p>19 out immediately and gave him a box of pouches.</p> <p>20 Patient was very happy to receive them. Does that</p> <p>21 sound --</p> <p>22 A Yes, I was, because I was tired of that bag falling</p> <p>23 off and getting feces on my clothes. But I thought it</p> <p>24 had fitted when I first put it on, but it ease itself</p> <p>25 off. And that's what I was trying to explain to you</p>	<p style="text-align: right;">Page 124</p> <p>1 bunkie because he wanted me out and they wouldn't move</p> <p>2 me. I talked to the counselor, Mr. Wilkinson, about</p> <p>3 being moved before that, but they wouldn't move me,</p> <p>4 and my bunkie and I -- you know, we got -- that's how</p> <p>5 my whole prison stay was. Like, no one wanted me</p> <p>6 around when I had that bag.</p> <p>7 When I was in the county jail they would</p> <p>8 clear the whole rock -- everybody out for me to clean</p> <p>9 my bag when I would go to the bathroom. I would have</p> <p>10 problems with people in the bathroom when I be</p> <p>11 cleaning my bag in the stall because the smell of</p> <p>12 it -- it did not smell like feces. It smelled like</p> <p>13 the insides of me. It was, like, terrible. Would</p> <p>14 make me nauseous. And I'm sure other people, too.</p> <p>15 And my bunkie, he didn't appreciate that.</p> <p>16 Q After you got into the fight with the inmate, the</p> <p>17 hospital -- I'm sorry -- the MDOC sent you to the</p> <p>18 emergency room?</p> <p>19 A Uh-huh.</p> <p>20 Q You got treated at the emergency room?</p> <p>21 A The MDOC sent me to the emergency room? No.</p> <p>22 Q When you got into a fight --</p> <p>23 A You mean outside of the prison?</p> <p>24 Q Outside of the hospital.</p> <p>25 A No.</p>

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<p style="text-align: right;">Page 125</p> <p>1 Q You didn't receive any treatment after you had the --</p> <p>2 after you had an incident? You never went to the ER?</p> <p>3 A I never received any treatment in prison at all. They</p> <p>4 maybe gave me some supplies for my colostomy but they</p> <p>5 never treated me for nothing. Not after the fight,</p> <p>6 not before the fight.</p> <p>7 Q They didn't send you to the Duane Waters --</p> <p>8 A Oh, yeah, I did go to Duane Waters. Yeah. And they</p> <p>9 did some X-rays. Sure did. Because my colostomy --</p> <p>10 I told them my colostomy was bleeding. My stoma was</p> <p>11 bleeding.</p> <p>12 Q And that was after you had gotten punched in the</p> <p>13 stomach; right?</p> <p>14 A During the fight.</p> <p>15 Q So when you had that physical issue where you had some</p> <p>16 bleeding from the fight you were in, the health care</p> <p>17 at the MDOC at that point treated it, sent you to the</p> <p>18 emergency room; right?</p> <p>19 A Yeah, they sent me to the emergency room at MDOC.</p> <p>20 Q Okay. That's all I wanted to know.</p> <p>21 A Yeah. I remember that now.</p> <p>22 Q And that particular physical incident was the only</p> <p>23 incident that when you were in the Department of</p> <p>24 Corrections where you actually had an injury,</p> <p>25 something physical actually happened to the colostomy,</p>	<p style="text-align: right;">Page 127</p> <p>1 Q Wait. Mr. Jackson --</p> <p>2 A Go ahead, sir.</p> <p>3 Q I don't want to have her read the question back.</p> <p>4 A I'm trying to answer but you keep cutting me off.</p> <p>5 Q You are actually --</p> <p>6 MR. SCARBER: Counsel, I'm going to have</p> <p>7 to ask you to instruct him to let me at least finish</p> <p>8 my answer (sic) before you start --</p> <p>9 THE WITNESS: And what I want to say to</p> <p>10 you was you finished that question and when I went to</p> <p>11 answer, you cut me off.</p> <p>12 BY MR. SCARBER:</p> <p>13 Q I was not finished and I haven't finished with a lot</p> <p>14 of them. And I'm allowing it just because you're</p> <p>15 trying to get out something and sometimes I'll let it</p> <p>16 go, but other times I just want to get right to</p> <p>17 whatever my question is.</p> <p>18 A Okay.</p> <p>19 Q Okay. Other than the fight in January of 2018 where</p> <p>20 you had a physical injury to the colostomy, where</p> <p>21 there was some kind of injury to it and maybe you had</p> <p>22 to go to the hospital for it and they sent you to the</p> <p>23 hospital, did you have any other physical injury that</p> <p>24 occurred with your colostomy?</p> <p>25 A May I answer?</p>
<p style="text-align: right;">Page 126</p> <p>1 right, that was causing you a problem?</p> <p>2 A Uh-huh. No, sir.</p> <p>3 Q So let me follow up on my question. So you said no.</p> <p>4 Did you have any other fights in the MDOC where you</p> <p>5 had some kind of physical injury that you sustained to</p> <p>6 your stomach or the area where your colostomy was?</p> <p>7 A I had another fight in St. Louis with my bunkie -- a</p> <p>8 different bunkie -- about the smell of my bag, but I</p> <p>9 didn't receive any injuries. Like, everywhere I went</p> <p>10 I would get in problems with my bunkies and --</p> <p>11 Q Well, my question is more related -- and I appreciate</p> <p>12 that, but my question is more related to the injuries</p> <p>13 that you might have had to the colostomy, where it was</p> <p>14 causing you some kind of physical issue. And I think</p> <p>15 you answered this. Other than the fight where you had</p> <p>16 a physical injury from the colostomy in January of</p> <p>17 2018, did you ever have any other physical injury that</p> <p>18 occurred with the colostomy?</p> <p>19 A Yes, sir.</p> <p>20 Q What other physical injury did you have --</p> <p>21 A Oh --</p> <p>22 Q Wait. Let --</p> <p>23 A I'm trying to answer the question, Brother. I'm</p> <p>24 trying to answer the question and you, like -- let me</p> <p>25 tell you --</p>	<p style="text-align: right;">Page 128</p> <p>1 Q Yes.</p> <p>2 A Right now?</p> <p>3 Q Yes.</p> <p>4 A Yes.</p> <p>5 Q Okay. Now you answered yes. So my question -- my</p> <p>6 follow-up question is going to what? What was your</p> <p>7 other injury that you had to your colostomy?</p> <p>8 A May I answer now?</p> <p>9 Q Yes.</p> <p>10 A I always had a stomach pain on the right side of my</p> <p>11 stomach since I first had the surgery, which I</p> <p>12 informed Dr. Webber of, and he said maybe, possibly a</p> <p>13 hernia. I've been having that same pain since the</p> <p>14 beginning. And I had it then.</p> <p>15 Q So my question is more related to a physical injury</p> <p>16 that you received to it. Knowing that, when I say</p> <p>17 physical injury -- maybe I should use the word trauma.</p> <p>18 Did you ever have any other trauma to your colostomy</p> <p>19 area after January 2018 when they sent you to the</p> <p>20 emergency room to be treated for it?</p> <p>21 A I had the same trauma the whole time since I had the</p> <p>22 first surgery. The pain in my stomach.</p> <p>23 Q But no one ever hit you in your stomach or --</p> <p>24 A Before then?</p> <p>25 Q After January 5th of 2018.</p>

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<p style="text-align: right;">Page 129</p> <p>1 A No, sir. No, sir.</p> <p>2 Q After January 5th of 2018, did any -- did you have any</p> <p>3 other injury where someone caused you any trauma or</p> <p>4 hit you near the area of your colostomy?</p> <p>5 A Did anybody hit me in my stomach after the fight? No.</p> <p>6 Q When you were with the MDOC did you always receive</p> <p>7 what we call an order for the bottom bunk?</p> <p>8 A No.</p> <p>9 Q When you were staying with the MDOC there were times</p> <p>10 when you did not have an order for a bottom bunk?</p> <p>11 A Yes.</p> <p>12 Q When was that?</p> <p>13 A When I -- I was on the top bunk when I first got in</p> <p>14 Jackson.</p> <p>15 Q How long were you on the top bunk?</p> <p>16 A I can't tell you exactly how long but I know I was up</p> <p>17 there until I got moved out of that total unit. See,</p> <p>18 the cube, they didn't want me in the unit because the</p> <p>19 bag, so they moved me. And that's when I remember</p> <p>20 first getting the bottom bunk. Or did I go to the</p> <p>21 bottom bunk -- when I first got to prison, I didn't</p> <p>22 have no order for the bottom bunk for a minute.</p> <p>23 Q At some point you did get an order for a bottom bunk?</p> <p>24 A Yes, I did.</p> <p>25 Q Okay.</p>	<p style="text-align: right;">Page 131</p> <p>1 aware of or nothing like that. They ain't referred me</p> <p>2 to no doctors to get reversed or anything. I had to</p> <p>3 do all that on my own. What do you mean care plan?</p> <p>4 Q Let me -- did they meet with you to provide you with</p> <p>5 30 days of ostomy supplies when you were released from</p> <p>6 jail?</p> <p>7 A No. I got my supplies --</p> <p>8 Q I'm sorry -- from prison.</p> <p>9 A No, not that I can remember.</p> <p>10 Q I have a note here of --</p> <p>11 A I got --</p> <p>12 Q Well, let me finish.</p> <p>13 A You asked me a question and I can't answer --</p> <p>14 Q I thought you were done. Go ahead. I'm sorry. Go</p> <p>15 ahead.</p> <p>16 A I got supplies for that month.</p> <p>17 Q For the month of what?</p> <p>18 A The last month I was in prison, in May.</p> <p>19 Q I have a note here of May 16, 2019. It indicates that</p> <p>20 the "Prisoner to have a 30-day ostomy supplies given</p> <p>21 as prisoner is paroling today."</p> <p>22 A Yeah. They might have given me some bags to go.</p> <p>23 Q Okay.</p> <p>24 A But I believe that was the time I was supposed to get</p> <p>25 my refill anyway. That's why I said that. That was</p>
<p style="text-align: right;">Page 130</p> <p>1 A Because when I would climb up to the top bunk,</p> <p>2 sometimes my bag would come off because they wasn't</p> <p>3 always fitting right.</p> <p>4 Q So at some point, though, after that had happened you</p> <p>5 ended up getting an order so that you could be on the</p> <p>6 bottom bunk; right?</p> <p>7 A Yes.</p> <p>8 Q You were also provided, in addition to bags, pouches,</p> <p>9 paste for your colostomy supplies -- you were also</p> <p>10 provided with an odor eliminator drop; right?</p> <p>11 A They didn't start giving me that odor eliminator drop</p> <p>12 till four months, five months before it was time for</p> <p>13 me to go. Yeah, I did get it. And I said, man,</p> <p>14 that's crazy. Why didn't I --</p> <p>15 Q When you got the odor eliminator drop, that helped</p> <p>16 things; right?</p> <p>17 A Yeah, to a certain extent it did.</p> <p>18 Q Okay. And when you got ready to be released from</p> <p>19 prison, they actually met with you and tried to help</p> <p>20 you develop a care plan for when you got released;</p> <p>21 correct?</p> <p>22 A Who are they?</p> <p>23 Q The people from the jail. The health care people.</p> <p>24 A A care plan? I wouldn't say that. No. No, they</p> <p>25 didn't. They didn't -- it wasn't a care plan that I'm</p>	<p style="text-align: right;">Page 132</p> <p>1 the time -- every month I got my refill. That was the</p> <p>2 time. It's, like, two weeks -- every two weeks it was</p> <p>3 time to get my refill, so basically that's what that</p> <p>4 was.</p> <p>5 Q So every two weeks they would give you a refill and</p> <p>6 then on this particular occasion when you were getting</p> <p>7 paroled, they gave you another refill for even when</p> <p>8 you weren't going to be in the prison; right?</p> <p>9 A I just believe they just gave me the 30-day refill</p> <p>10 last time, right before I left.</p> <p>11 Q So you had supplies even after you left from the</p> <p>12 prison; correct?</p> <p>13 A The ones they gave me, the refill.</p> <p>14 Q Okay. When you came to the prison in March of 2017,</p> <p>15 your colostomy was functional; correct?</p> <p>16 A It worked.</p> <p>17 Q Your colostomy was functional the entire time you were</p> <p>18 in the prison; right?</p> <p>19 A Yes.</p> <p>20 Q Now, I note that they also offered you some counseling</p> <p>21 if you wanted some counseling, like psychological</p> <p>22 counseling on how to be able to cope with having a</p> <p>23 colostomy when you came to the prison.</p> <p>24 A They offered everybody. They offered the standard to</p> <p>25 prisoners. You know what I mean? They wasn't nothing</p>

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<p style="text-align: right;">Page 133</p> <p>1 special they gave me. They offered a standard to a</p> <p>2 prisoner for anybody that feel like they need mental</p> <p>3 health or whatever, you know, to see somebody. That's</p> <p>4 just standardly offered.</p> <p>5 Q But it was also offered to you; correct?</p> <p>6 A Yes, just like any other inmate without a bag or with</p> <p>7 one.</p> <p>8 Q Did you use it?</p> <p>9 A No. I never went to see a psych because I'm not real</p> <p>10 big on medication. You know, most of the people that</p> <p>11 were seeing the psych they had to be on meds in the</p> <p>12 jail, and I didn't want to be on meds.</p> <p>13 Q So we talked about, Mr. Jackson, that when you came to</p> <p>14 the prison -- we talked about that they did</p> <p>15 assessments on you, they did X-rays on you, they</p> <p>16 provided you with supplies. We talked about some of</p> <p>17 the issues with that. We talked about providing you</p> <p>18 with supplies. They offered you mental health. When</p> <p>19 you went to the emergency room when you got into a</p> <p>20 fight and had a physical injury or physical trauma to</p> <p>21 the colostomy, they sent you to emergency room for</p> <p>22 treatment for that. Now I want to talk to you about</p> <p>23 the reversal that you wanted in prison. Well, that</p> <p>24 you originally wanted in the jail but you didn't get</p> <p>25 it in the jail so you wanted it also in prison;</p>	<p style="text-align: right;">Page 135</p> <p>1 Q And you wrote the -- we'll call it the ombudsman for</p> <p>2 the prison, and do you recall that the ombudsman told</p> <p>3 you that specifically in order to get or to qualify</p> <p>4 for the reversal, he had to look at some of their</p> <p>5 policies to determine whether or not you met the MDOC</p> <p>6 policies?</p> <p>7 A Uh-huh.</p> <p>8 Q Is that a yes?</p> <p>9 A What do you mean?</p> <p>10 Q Did the ombudsman, when you contacted the ombudsman,</p> <p>11 advise you that there were specific MDOC policies that</p> <p>12 you had to have met and satisfied in order for you to</p> <p>13 be able to have a colostomy reversal while you were in</p> <p>14 the MDOC?</p> <p>15 A They told me that if I could pay for it, if my family</p> <p>16 could pay for it, that they would do the surgery, that</p> <p>17 they would do the reversal. They said that if I could</p> <p>18 pay for the expenses of the surgery, if I could pay</p> <p>19 the overtime to the officers that were watching me in</p> <p>20 the hospital, then I would be requesting outside</p> <p>21 medical services and they would indeed do the surgery.</p> <p>22 And that's what I didn't understand, because I'm,</p> <p>23 like, you guys would have did the surgery if my family</p> <p>24 would have paid for it, but you all won't do it now</p> <p>25 because you all got to pay for it, and I can't afford</p>
<p style="text-align: right;">Page 134</p> <p>1 correct?</p> <p>2 A Uh-huh.</p> <p>3 Q Is that correct? Yes?</p> <p>4 A Yes. I needed it in prison. Not wanted. I needed</p> <p>5 it.</p> <p>6 Q And did you ever have any reviews performed as to</p> <p>7 whether it would be provided to you while you were in</p> <p>8 prison?</p> <p>9 A Reviews performed. What do you mean?</p> <p>10 Q Let me rephrase my question. It's a technical</p> <p>11 question. It's not a good question. I should ask</p> <p>12 this question: Did you ever go through any procedures</p> <p>13 where you tried to get the MDOC to do a reversal of</p> <p>14 your colostomy while you were in prison?</p> <p>15 A Did I write (inaudible) and stuff like that? That's</p> <p>16 what you asking me?</p> <p>17 Q Sure.</p> <p>18 COURT REPORTER: I'm sorry. Did I write</p> <p>19 -- I didn't understand.</p> <p>20 MR. SCARBER: The ombudsman.</p> <p>21 A Yes, I wrote the ombudsman. I did everything</p> <p>22 possible. I wrote the medical staff. I did</p> <p>23 everything that I could possibly do to receive the</p> <p>24 reversal. Yes, I did.</p> <p>25 BY MR. SCARBER:</p>	<p style="text-align: right;">Page 136</p> <p>1 to pay for it.</p> <p>2 Q Did the MDOC specifically advise you --</p> <p>3 A That was the letter I got --</p> <p>4 Q -- that there were --</p> <p>5 A -- from the ombudsman.</p> <p>6 Q -- that there were policies that your surgery would</p> <p>7 fall under and those policies would have to be</p> <p>8 satisfied in order for you to have the surgery?</p> <p>9 A MDOC told me they wouldn't do the surgery because it</p> <p>10 was cosmetic, and they said I was more worried about</p> <p>11 my appearance, I think.</p> <p>12 Q Okay. And you were having some issues with how it</p> <p>13 appeared, how people looked at you --</p> <p>14 A Who said that?</p> <p>15 Q I'm not finished with my question. Let me finish my</p> <p>16 question.</p> <p>17 A Yeah, thank you. Because you said "you were."</p> <p>18 Q Were you having issues with how the colostomy</p> <p>19 appeared?</p> <p>20 A No.</p> <p>21 Q Were you having issues with how other -- how the other</p> <p>22 inmates were perceiving you because you had the</p> <p>23 colostomy?</p> <p>24 A I was having issues with how the other inmates was</p> <p>25 reacting to me having the colostomy.</p>



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<p style="text-align: right;">Page 137</p> <p>1 Q Okay.</p> <p>2 A But as far appearance go, you couldn't see it because</p> <p>3 it was under my clothes, unless it would blow up in a</p> <p>4 balloon when I passed gas. That's a whole other</p> <p>5 issue. But as far as appearance go, it wasn't</p> <p>6 appearance. It was about me having to have this bag</p> <p>7 and feel like an animal. Every time I cleaned it, it</p> <p>8 would be like cleaning a dog kennel, and it was about</p> <p>9 me having to be uncomfortable with this bag the whole</p> <p>10 time and it was about me wondering if they ever was</p> <p>11 going to take it off. That's what my issue was. It</p> <p>12 wasn't nothing about the appearance.</p> <p>13 Q The issues that you describe, would you agree with me</p> <p>14 that they concern the colostomy from the standpoint of</p> <p>15 it being something that was attached to you that you</p> <p>16 basically had to learn how to function with?</p> <p>17 A You got to rephrase the question.</p> <p>18 Q Yeah, let me rephrase the question. The issues that</p> <p>19 you were having with the colostomy bag, you would</p> <p>20 agree with me even the issues that you just described</p> <p>21 are more about how you were going to have to cope with</p> <p>22 this thing with the other inmates with the smell, with</p> <p>23 --</p> <p>24 A It wasn't -- I didn't just describe that. I'm sorry.</p> <p>25 I didn't say that.</p>	<p style="text-align: right;">Page 139</p> <p>1 A What do you mean? Did I have a problem about changing</p> <p>2 the bag?</p> <p>3 Q Yes.</p> <p>4 A I had no problem about changing the bag. Actually, I</p> <p>5 wanted to keep it changed.</p> <p>6 Q And you were able to change the bag; correct?</p> <p>7 A Yes, when I was able to have the right supplies to</p> <p>8 change the bag.</p> <p>9 Q And you were taught how to do that; correct?</p> <p>10 A Yes.</p> <p>11 Q And you knew how to change it.</p> <p>12 A Yes. It was the --</p> <p>13 Q There's no question on the table.</p> <p>14 A I'll be --</p> <p>15 Q So you can't --</p> <p>16 A I'm still answering.</p> <p>17 Q But we're done with the answer.</p> <p>18 A I didn't know we was done.</p> <p>19 Q We're done.</p> <p>20 A All right. Thank you.</p> <p>21 Q Were you ever disabled because you had the colostomy</p> <p>22 bag on?</p> <p>23 A Disabled to do what? For what?</p> <p>24 Q Were you ever not able to walk because you had the</p> <p>25 colostomy bag?</p>
<p style="text-align: right;">Page 138</p> <p>1 Q Did you have a problem with the way it smelled?</p> <p>2 A I had a problem --</p> <p>3 Q Just answer my question. Did you have the problem</p> <p>4 with the way that it smelled?</p> <p>5 A I didn't like the way it smelled.</p> <p>6 Q Did you have a problem with how the other inmates</p> <p>7 looked at you because --</p> <p>8 A I didn't have -- you ask me the question. Let me</p> <p>9 answer it, sir.</p> <p>10 Q I never even finished it.</p> <p>11 A Okay. Go ahead. Finish.</p> <p>12 Q Did you have a problem with the way the inmates looked</p> <p>13 at you because -- or felt about you because you had a</p> <p>14 colostomy bag?</p> <p>15 A Are you finished?</p> <p>16 Q I'm finished.</p> <p>17 A Okay. I didn't have the problem with the way the</p> <p>18 inmates looked at me. I had a problem about the way</p> <p>19 they reacted to me. The things that they did. It</p> <p>20 wasn't about the way someone looked at me. It was --</p> <p>21 Q So it was how they reacted to you?</p> <p>22 A Yes, yes. I didn't like the way they reacted to me</p> <p>23 because I had a bag.</p> <p>24 Q Did you have a problem because you had to change the</p> <p>25 bag?</p>	<p style="text-align: right;">Page 140</p> <p>1 A You mean, because the colostomy bag was on, I was</p> <p>2 unable to walk?</p> <p>3 Q Yes.</p> <p>4 A The colostomy bag didn't stop me from walking but</p> <p>5 there was a point in time when I was unable to walk</p> <p>6 after the surgery.</p> <p>7 Q Okay. After the surgery and after you were healed you</p> <p>8 were able to walk with the colostomy bag; correct?</p> <p>9 A Yes.</p> <p>10 Q And you also indicated, I think, with Mr. Willis's</p> <p>11 counseling -- questions -- I'm sorry -- that you were</p> <p>12 also able to work out with the colostomy bag; correct?</p> <p>13 A Yes.</p> <p>14 Q And what kind of workouts did you do when you were in</p> <p>15 the Department of Corrections in prison?</p> <p>16 A Calisthenics.</p> <p>17 Q Tell me what --</p> <p>18 A Weights.</p> <p>19 Q Describe to me the calisthenics that you were doing.</p> <p>20 Just break it down for me.</p> <p>21 A Just different things. Jumping jacks. Pushups.</p> <p>22 Pull-ups.</p> <p>23 Q How often did you do those types of workouts or</p> <p>24 calisthenics?</p> <p>25 A As often as I could.</p>

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<p style="text-align: right;">Page 141</p> <p>1 Q Several times a week?</p> <p>2 A Yeah. But it was like --</p> <p>3 Q The question is over.</p> <p>4 Did you receive a letter from the</p> <p>5 ombudsman on November the 7th, 2017 that stated that</p> <p>6 the MDOC policy directive states that corrective</p> <p>7 surgery is a surgical procedure to alter or adjust</p> <p>8 body parts or the body structure. Reconstructive</p> <p>9 surgery is a surgical procedure to reform body</p> <p>10 structure or correct defects. For the purposes of</p> <p>11 this policy, corrective and reconstructive surgery</p> <p>12 does not include procedures which can be done</p> <p>13 under local anesthesia. Corrective and reconstructive</p> <p>14 surgery shall be authorized for a prisoner only if</p> <p>15 determined medically necessary and only if approved by</p> <p>16 the CMO, Chief Medical Officer. It shall not be</p> <p>17 approved for the sole purpose to improve appearance.</p> <p>18 Did you receive a letter to that extent?</p> <p>19 A Yes, sir.</p> <p>20 Q And did you have an understanding of the policies that</p> <p>21 were being referenced?</p> <p>22 A Yes, and I believe --</p> <p>23 Q You had an understanding. I didn't ask you</p> <p>24 to comment. Did you have an understanding of it?</p> <p>25 A I say yes.</p>	<p style="text-align: right;">Page 143</p> <p>1 Q -- of your grievance was --</p> <p>2 A No.</p> <p>3 Q -- with the Department of Corrections?</p> <p>4 A No.</p> <p>5 Q Did you ever remember receiving a document like that?</p> <p>6 MR. SCARBER: And let the record reflect</p> <p>7 that I just handed Mr. Jackson and his counsel the</p> <p>8 grievance appeal response that was attached to his</p> <p>9 Complaint as Exhibit H.</p> <p>10 A Yeah, okay.</p> <p>11 BY MR. SCARBER:</p> <p>12 Q Do you recall receiving that?</p> <p>13 A Yes, sir.</p> <p>14 Q And do you see the box that says, "Summary of Step 2</p> <p>15 Investigation"?</p> <p>16 A Yeah, Summary of Step 2 Investigation. Okay.</p> <p>17 Q And do you see where it indicates that "The Michigan</p> <p>18 Department of Corrections doesn't reverse colostomies</p> <p>19 unless it is medically necessary. The surgery you are</p> <p>20 requesting is not essential. Currently documentation</p> <p>21 reflects the colostomy is functional"? Do you see</p> <p>22 that?</p> <p>23 A Uh-huh. The Michigan Department of Corrections.</p> <p>24 Q Okay. Do you also see down at the bottom in the</p> <p>25 Conclusion section that it indicates that your</p>
<p style="text-align: right;">Page 142</p> <p>1 Q Okay. Are you aware that -- you said you reviewed Dr.</p> <p>2 Kansakar's testimony?</p> <p>3 A I watched the deposition.</p> <p>4 Q You watched the video?</p> <p>5 A Uh-huh.</p> <p>6 Q Are you aware that she testified when asked about the</p> <p>7 particular policies that the MDOC was citing to you</p> <p>8 that she basically described the procedure that you</p> <p>9 were having as a corrective surgery or a</p> <p>10 reconstructive surgery?</p> <p>11 A Uh-uh. I can't speak on that.</p> <p>12 Q Where she was specifically asked --</p> <p>13 A I don't remember.</p> <p>14 Q So you don't remember?</p> <p>15 A Yeah.</p> <p>16 Q Okay. Did you ultimately file any -- take any actions</p> <p>17 concerning your getting a colostomy reversal such as a</p> <p>18 grievance or anything like that?</p> <p>19 A You mean did I file a grievance?</p> <p>20 Q Did you file a grievance with the Michigan Department</p> <p>21 of Corrections regarding colostomy reversal?</p> <p>22 A Yes. I also filed one with St. Clair County. Filed</p> <p>23 grievances with them, too.</p> <p>24 Q And do you remember what the result --</p> <p>25 A No, I don't remember.</p>	<p style="text-align: right;">Page 144</p> <p>1 grievance is being denied and that it says that the</p> <p>2 reversal is a major surgery with potential</p> <p>3 complications, up to death, and the department will</p> <p>4 not okay a dangerous, unnecessary elective procedure?</p> <p>5 A reversal for a functional colostomy is considered</p> <p>6 nonessential. Do you see that?</p> <p>7 A Uh-huh.</p> <p>8 Q And you recall receiving this response at some point;</p> <p>9 correct?</p> <p>10 A Uh-huh.</p> <p>11 Q You have to answer yes.</p> <p>12 A Yes, sir.</p> <p>13 Q And if you said "uh-huh" to the question before that</p> <p>14 you meant yes; correct?</p> <p>15 A Correct.</p> <p>16 Q Okay.</p> <p>17 A I received this.</p> <p>18 Q And who is this particular grievance response signed</p> <p>19 by?</p> <p>20 A I don't know. You tell me.</p> <p>21 Q At the bottom does it indicate a Subrina Aiken, RN?</p> <p>22 A Yeah.</p> <p>23 Q Do you know if Subrina Aiken, RN works for Corizon?</p> <p>24 A I don't know her.</p> <p>25 Q I want you to assume that Mrs. Aiken does not work for</p>

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<p style="text-align: right;">Page 145</p> <p>1 Corizon and that she works for the MDOC.</p> <p>2 A Why am I assuming that?</p> <p>3 Q Because it's true.</p> <p>4 A Okay.</p> <p>5 Q So why didn't you sue Subrina Aiken?</p> <p>6 A Why didn't I sue Subrina Aiken? What do you mean? I</p> <p>7 don't know Subrina Aiken.</p> <p>8 Q According to the letter that I just read to you from</p> <p>9 the ombudsman, as well as the Step 2 grievance appeal</p> <p>10 response, it indicates that there is an MDOC policy</p> <p>11 that describes whether or not your particular</p> <p>12 colostomy reversal will be approved. My question is,</p> <p>13 why didn't you sue the MDOC in this particular case</p> <p>14 instead of the Corizon defendants?</p> <p>15 A Huh?</p> <p>16 Q Do you --</p> <p>17 A Who is Corizon defendants? Insurance company; right?</p> <p>18 Q Corizon defendants, Mr. Jackson, are the health care</p> <p>19 providers within the jail -- I'm sorry -- within the</p> <p>20 prison.</p> <p>21 A Right. Because they were the responsible people,</p> <p>22 obviously.</p> <p>23 Q And my question to you is, are you aware that Corizon</p> <p>24 does not make the Michigan Department of Corrections</p> <p>25 policies?</p>	<p style="text-align: right;">Page 147</p> <p>1 Q Let me repeat my question again. Do you have an</p> <p>2 understanding that some people elect to have their</p> <p>3 colostomy --</p> <p>4 A Elect.</p> <p>5 Q Let me rephrase the question.</p> <p>6 MR. CROSS: Let him --</p> <p>7 THE WITNESS: I don't understand.</p> <p>8 BY MR. SCARBER:</p> <p>9 Q I'm going to use a different word. Do you have an</p> <p>10 understanding, sir, that some patients choose to have</p> <p>11 a colostomy reversal and some people choose not to</p> <p>12 have a colostomy reversal?</p> <p>13 A Am I aware that some people choose and some people</p> <p>14 choose not to?</p> <p>15 Q Yes.</p> <p>16 A By choice? Or by some people don't have a colostomy</p> <p>17 reversal because they can't?</p> <p>18 Q Are you aware that by choice --</p> <p>19 A By choice. So they choose not to. So you telling me</p> <p>20 that if someone with a colostomy --</p> <p>21 Q My question --</p> <p>22 A I'm asking the question, sir. Can I ask the question?</p> <p>23 That's all I'm saying. Can I ask the question so I</p> <p>24 can answer it correctly?</p> <p>25 Q If you can't understand the question --</p>
<p style="text-align: right;">Page 146</p> <p>1 A Am I aware that the Corizon doesn't make -- am I</p> <p>2 aware? Who said that? You showing me that? No, I'm</p> <p>3 not aware. But now that you're informing me, I am.</p> <p>4 Is that true?</p> <p>5 Q That is true.</p> <p>6 A Okay. Now I'm aware.</p> <p>7 Q When you saw Dr. Webber after you got released from</p> <p>8 prison, did he explain to you that you can have a</p> <p>9 reversal if you want to have a reversal, you could</p> <p>10 decide you don't want to have a reversal, it's kind of</p> <p>11 up to you if you want to have a reversal or not?</p> <p>12 A Nobody never told me that.</p> <p>13 Q So when you saw Dr. Webber, he insisted and forced you</p> <p>14 to have a colostomy reversal?</p> <p>15 A Nobody gave me the option you can have it or you</p> <p>16 can't. Of course I needed it.</p> <p>17 Q But did Dr. Webber advise you that you could choose to</p> <p>18 have the procedure or you could choose not to have the</p> <p>19 procedure?</p> <p>20 A He never gave me that option. It's common sense.</p> <p>21 Either I can walk out this door or I can't not. He</p> <p>22 never gave me an option.</p> <p>23 Q Do you have an understanding that some people elect to</p> <p>24 have their colostomies reversed?</p> <p>25 A Huh?</p>	<p style="text-align: right;">Page 148</p> <p>1 A Then rephrase it.</p> <p>2 Q -- then I'll rephrase.</p> <p>3 A There you go.</p> <p>4 Q Do you understand, sir, that there are some patients</p> <p>5 that choose to have a colostomy reversed and there are</p> <p>6 some people that choose not to have a colostomy</p> <p>7 reversed?</p> <p>8 A No, I don't understand that.</p> <p>9 Q Okay. So you --</p> <p>10 A So are you saying -- I'm asking you, are you saying</p> <p>11 that is people with the colostomy bag that can get it</p> <p>12 reversed, no problem, choose not to? Is that what you</p> <p>13 telling me?</p> <p>14 Q Are you aware that that occurs, where some people --</p> <p>15 A No, I'm not.</p> <p>16 Q -- who are eligible for reversal decide they don't</p> <p>17 want --</p> <p>18 A No, I'm not aware of that.</p> <p>19 Q Okay. When you got out of prison did anybody ever</p> <p>20 tell you -- any medical doctor when you got out of</p> <p>21 prison ever tell you that you absolutely had to -- you</p> <p>22 had to choose to have a colostomy reversal?</p> <p>23 A Say that again. Rephrase that question again.</p> <p>24 Q When you got out of prison in May of 2019, did any</p> <p>25 medical doctor, any medical professional at all, at</p>

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<p style="text-align: right;">Page 149</p> <p>1 that point tell you that you absolutely had to have a</p> <p>2 colostomy reversal?</p> <p>3 A Nobody told me. I wanted it. Needed it.</p> <p>4 Q So no health care provider ever told you that after</p> <p>5 you got out of jail; correct?</p> <p>6 A Of course not. I needed it. I wanted it.</p> <p>7 Q My question is, did any -- you would agree with me</p> <p>8 that no medical provider or doctor ever told you that</p> <p>9 you had to have it when you got out of prison. Yes or</p> <p>10 no?</p> <p>11 A Yes.</p> <p>12 Q No, you agree; right?</p> <p>13 A Yes. No, I don't agree.</p> <p>14 Q So what doctor told you that you must --</p> <p>15 A Not must. A doctor prescribed for me to have it. Dr.</p> <p>16 Kansakar.</p> <p>17 Q I'm talking about when you got out of jail.</p> <p>18 A Oh, when I got out of jail someone had told me I had</p> <p>19 to have it?</p> <p>20 Q Yeah.</p> <p>21 A No one told. I needed and wanted it.</p> <p>22 Q Okay. You feel like you needed it and you wanted it;</p> <p>23 right?</p> <p>24 A Yes. No one --</p> <p>25 Q So my next question is, so you elected to have it;</p>	<p style="text-align: right;">Page 151</p> <p>1 A What you mean back to? Yeah. The natural way I would</p> <p>2 have been going to the bathroom, that was the whole</p> <p>3 purpose --</p> <p>4 Q Okay.</p> <p>5 A -- to go to the bathroom in a natural way.</p> <p>6 Q And that's what you -- so you wanted Dr. Webber to put</p> <p>7 you back to the way you were before the surgery;</p> <p>8 correct?</p> <p>9 A I wanted to -- wanted Dr. Webber to put me to the way</p> <p>10 I could use the bathroom in a more normal and natural</p> <p>11 way.</p> <p>12 Q Okay. Like you had been using before you had the</p> <p>13 colostomy in the first place; right?</p> <p>14 A What do you mean?</p> <p>15 Q Had you been using --</p> <p>16 A Had I been going to the bathroom in a natural, normal</p> <p>17 way before the surgery?</p> <p>18 Q Yes.</p> <p>19 A Yes, I was. Did I want to go to the bathroom in a</p> <p>20 natural, normal way after the surgery? Yes, I did.</p> <p>21 Q So you chose to go to Dr Webber and Dr. Webber agreed</p> <p>22 that he would perform the surgery for you; correct?</p> <p>23 A Yes. Correct.</p> <p>24 Q And, in fact, he -- before he even did the surgery he</p> <p>25 had you sign -- we talked about this -- he had you</p>
<p style="text-align: right;">Page 150</p> <p>1 right?</p> <p>2 A I elected to have it?</p> <p>3 Q I'm sorry. You chose to have it because you felt like</p> <p>4 you needed it and wanted it; correct?</p> <p>5 A Yes.</p> <p>6 Q That's what we call in medical terms elective</p> <p>7 procedure. When it's not necessarily something that</p> <p>8 you -- that a doctor tells you you absolutely have to</p> <p>9 have but it's something that you choose to have. We</p> <p>10 call that something that you elect -- we call that an</p> <p>11 elective procedure. You understand that?</p> <p>12 A Uh-uh. No, I don't know because the fact that I did</p> <p>13 not choose to go to the bathroom on my stomach. I</p> <p>14 didn't choose. That's not like a choice thing. It</p> <p>15 was, like, normal to put me back how I was born. So</p> <p>16 it was like -- that's not, like, a choice type of</p> <p>17 thing.</p> <p>18 Q So then you would agree, then, that the procedure that</p> <p>19 you wanted to have was something that was going to</p> <p>20 kind of reconstruct your body to the way it originally</p> <p>21 was; correct?</p> <p>22 A I wouldn't say reconstruct but I would say it will</p> <p>23 allow me to go to the bathroom in a more natural way.</p> <p>24 Q Back to the way you originally went to the bathroom</p> <p>25 before you had the surgery to begin with; right?</p>	<p style="text-align: right;">Page 152</p> <p>1 sign something saying that you were the one that</p> <p>2 wanted the surgery and that you understood what all</p> <p>3 the risk and complications could be; right?</p> <p>4 A I don't recall.</p> <p>5 Q I'll rely on your prior answer, Mr. Jackson.</p> <p>6 Do you know Dr. Papendick?</p> <p>7 A Who is Dr. Papendick?</p> <p>8 Q So you don't know Dr. Papendick?</p> <p>9 A I think I do know who you're referring to but I don't</p> <p>10 know him on a personal basis.</p> <p>11 Q Do you know who Dr. Papendick is?</p> <p>12 A Dr. Papendick has to be -- yeah. I believe -- is Dr.</p> <p>13 Papendick the person who denied my reversal?</p> <p>14 Q Yes.</p> <p>15 A Yeah. I know who that is. I don't know him</p> <p>16 personally.</p> <p>17 Q Well, let me rephrase the question. And I'm not here</p> <p>18 to answer questions, but your allegation is that Dr.</p> <p>19 Papendick denied your colostomy reversal.</p> <p>20 A Okay.</p> <p>21 Q Did I just show you a record from the ombudsman that</p> <p>22 indicated that a final decision on whether you got a</p> <p>23 colostomy reversal or not would have to be made by the</p> <p>24 chief medical officer for the MDOC?</p> <p>25 A Huh? You just read something on a paper. You never</p>



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<p style="text-align: right;">Page 153</p> <p>1 let me see something. I don't recall you saying that.</p> <p>2 Q I'm going to hand you what is District Court filing</p> <p>3 12-7 page ID 261. Can you read what's highlighted for</p> <p>4 me, please?</p> <p>5 A "Constructive and reconstructive surgery shall be</p> <p>6 authorized for a prisoner only if determined</p> <p>7 necessary" -- "medical necessarily and only if</p> <p>8 approved by the CMO."</p> <p>9 Q And you don't have any knowledge that Dr. Papendick is</p> <p>10 the CMO, which means chief medical officer, do you?</p> <p>11 A I couldn't -- I don't know. I don't know that for</p> <p>12 sure. I don't know.</p> <p>13 Q Is your understanding from reading this, though, that</p> <p>14 it would be the chief medical officer that would have</p> <p>15 to approve -- make a final decision on a corrective</p> <p>16 reconstructive surgery?</p> <p>17 A Say that again.</p> <p>18 Q I just showed you a document --</p> <p>19 A Yeah, yeah, I read that, but what was your question?</p> <p>20 Q My question is, from what we just read, do you</p> <p>21 understand here where -- that it would be the chief</p> <p>22 medical officer, or CMO, that would have to give a</p> <p>23 final authorization and approval of whether you would</p> <p>24 be able to have constructive or reconstructive</p> <p>25 surgery?</p>	<p style="text-align: right;">Page 155</p> <p>1 procedure?</p> <p>2 A Why am I suing Dr. Papendick?</p> <p>3 Q Yes.</p> <p>4 A Because, obviously, he did -- what you mean? I</p> <p>5 couldn't answer that. I don't know the facts behind</p> <p>6 exactly what Dr. Papendick did. I don't know the</p> <p>7 facts behind exactly that, and I don't know the</p> <p>8 situation of that, so I can't answer that. I can just</p> <p>9 say I don't know. That's the best I can. Because</p> <p>10 it's not within my knowledge for me to give you a</p> <p>11 correct answer.</p> <p>12 Q We've already discussed, sir, that in the -- in the</p> <p>13 documents concerning your colostomy reversal in June</p> <p>14 of 2019 that you were advised that there could be</p> <p>15 potential complications up to death when we discussed</p> <p>16 those records, and you would agree with me that that</p> <p>17 particular record there indicates, specifically right</p> <p>18 here -- doesn't this record particularly state that</p> <p>19 reversal is a major surgery with potential</p> <p>20 complications up to death?</p> <p>21 A Huh?</p> <p>22 Q Does that particular note that I just gave you, that</p> <p>23 grievance appeal --</p> <p>24 A I wouldn't agree with it, but I see it.</p> <p>25 Q You see that it says --</p>
<p style="text-align: right;">Page 154</p> <p>1 A Okay. It says that on the paper and that's what you</p> <p>2 said?</p> <p>3 Q Yes. You agree with that?</p> <p>4 A I'm saying that's what it says on the paper and that's</p> <p>5 what you said.</p> <p>6 Q Okay. So if Dr. Papendick is not the CMO or chief</p> <p>7 medical officer of the MDOC, why are you suing Dr.</p> <p>8 Papendick?</p> <p>9 A What? You have to ask my attorney. You know what I</p> <p>10 mean? That's, like, a legal question. You know? You</p> <p>11 have to ask my attorney. You can't ask me stuff like</p> <p>12 that, why am I suing somebody.</p> <p>13 Q Well, this is ultimately your lawsuit.</p> <p>14 A Yes, but that's a question my attorney will have to</p> <p>15 answer. You know what I mean? About why are we suing</p> <p>16 Dr. Papendick and -- you know what I mean?</p> <p>17 Q So you don't know why you're suing Dr. Papendick?</p> <p>18 A I know but I don't feel like that's my place to answer</p> <p>19 it. I feel like it's my attorney's.</p> <p>20 Q Well, I can't ask your attorney the question. You're</p> <p>21 the plaintiff. He's just representing you. So I have</p> <p>22 to ask you the questions.</p> <p>23 Why are you suing Dr. Papendick if it is</p> <p>24 the CMO of the MDOC that makes the final determination</p> <p>25 on whether or not you would have a colostomy reversal</p>	<p style="text-align: right;">Page 156</p> <p>1 A I'm not in agreement but I see what you're explaining</p> <p>2 to me. I'm not in agreement with that.</p> <p>3 Q You don't agree that there were potential</p> <p>4 complications up to death with the procedure that you</p> <p>5 had?</p> <p>6 A I believe that with any surgery under anesthesia</p> <p>7 there's complications and the risk of death.</p> <p>8 Q And in fact, you would have signed an authorization</p> <p>9 and a consent with Dr. Webber and Dr. Kansakar</p> <p>10 indicating that you understood those risks; correct?</p> <p>11 A I signed something saying that I understood, yeah. I</p> <p>12 signed something saying that -- you know, that I was</p> <p>13 ready to have the surgery. I don't even think I read</p> <p>14 over it. I just was ready to have the surgery and</p> <p>15 signed it.</p> <p>16 Q Okay. You also signed something that indicated you</p> <p>17 had been explained those risks; correct?</p> <p>18 A I signed something -- I explained -- I don't know. Do</p> <p>19 you have that?</p> <p>20 Q I do.</p> <p>21 A Okay. Show me where I signed it and I can tell</p> <p>22 you that answer.</p> <p>23 MR. WILLIS: In the meantime, can we</p> <p>24 adjust the camera? It looks like the witness is</p> <p>25 moving out of frame or whatever.</p>

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<p style="text-align: right;">Page 157</p> <p>1 THE WITNESS: We've been at this for</p> <p>2 quite a while, man. I'm sorry.</p> <p>3 MR. WILLIS: That's okay. Thank you.</p> <p>4 THE WITNESS: Thank you.</p> <p>5 BY MR. SCARBER:</p> <p>6 Q That was your --</p> <p>7 A And I signed? You said I signed.</p> <p>8 Q You could turn it over.</p> <p>9 A Yeah, this doesn't say nothing about potential risk.</p> <p>10 Does it say something over here? Because where it</p> <p>11 says, "I hereby" --</p> <p>12 Q Let me show you, sir. It's highlighted up at the top.</p> <p>13 This is a consent form that you would have signed when</p> <p>14 you were undergoing even your original surgery here</p> <p>15 with Dr. Kansakar.</p> <p>16 A Okay.</p> <p>17 Q So you do --</p> <p>18 A Yeah, I signed it. I can't say I read it, but I</p> <p>19 signed it.</p> <p>20 Q Okay. Here's another form that you signed with</p> <p>21 respect to your original surgery. And I'll just show</p> <p>22 you here. "Severe complications with anesthesia can</p> <p>23 occur with the possibility of infection, bleeding,</p> <p>24 drug reaction, blood clots, loss of sensation, loss of</p> <p>25 limb function, paralysis, stroke, brain damage, heart</p>	<p style="text-align: right;">Page 159</p> <p>1 Q And since you have been out of prison, have you had</p> <p>2 any problems with the colostomy reversal that Dr.</p> <p>3 Webber performed?</p> <p>4 A Just a potential hernia that I've been having since I</p> <p>5 had the original surgery.</p> <p>6 Q Other than the potential hernia, are you having any</p> <p>7 kind of functional problems as a result of him</p> <p>8 performing the colostomy reversal that occurred when</p> <p>9 you got out prison?</p> <p>10 A No, sir, other than -- what I want to say was, I</p> <p>11 believe that if I would have had the surgery right</p> <p>12 away that I wouldn't have this much trauma. But they</p> <p>13 allowed me to heal all the way for years before they</p> <p>14 did the second surgery. If they had did surgery in</p> <p>15 the two months I don't believe I would have as much</p> <p>16 trauma to my stomach that I'm having. Like the</p> <p>17 potential hernia and the pains I've been having. You</p> <p>18 know? Because it healed all the way up and then they</p> <p>19 did the surgery after I got out of prison.</p> <p>20 Q Let me just try to ask the question again. And not</p> <p>21 necessarily from your medical opinion or about what</p> <p>22 you believe could have happened and all that kind of</p> <p>23 stuff. My question is more direct. Since you had the</p> <p>24 colostomy reversal surgery from Dr. Webber have you</p> <p>25 had any problems with the colostomy reversal that he</p>
<p style="text-align: right;">Page 158</p> <p>1 attack, death." Do you see that?</p> <p>2 A Uh-huh. Hold on. When was this? Yeah. Right,</p> <p>3 right, right. Okay, okay, okay. I remember that</p> <p>4 exactly. Because that's when Dr. Kansakar said that,</p> <p>5 you know, usually, most people that she do the</p> <p>6 reversal on are older and they have those but I really</p> <p>7 don't -- I don't have nothing wrong with me, so things</p> <p>8 should go fine. Yeah, I remember that.</p> <p>9 Q Do you also -- you remember signing it, too; right?</p> <p>10 A Yeah. Yeah, I do.</p> <p>11 Q And in particular in this grievance appeal, they're</p> <p>12 indicating here that that is a possibility; correct?</p> <p>13 A Uh-huh. That all surgeries that you go under</p> <p>14 anesthesia could be risky, yeah. Like, even if I</p> <p>15 broke my finger and I go have surgery and I have to be</p> <p>16 under anesthesia, that could risk death -- cause of</p> <p>17 death, yeah.</p> <p>18 Q Is that your medical opinion?</p> <p>19 A No. That's what I was told.</p> <p>20 Q Okay.</p> <p>21 MR. SCARBER: I'm going to move to strike</p> <p>22 that on foundation and hearsay.</p> <p>23 BY MR. SCARBER:</p> <p>24 Q You have been out of prison for how long now?</p> <p>25 A Since May 19, 2019.</p>	<p style="text-align: right;">Page 160</p> <p>1 actually performed?</p> <p>2 A I have a problem with my stom- -- the potential</p> <p>3 hernia.</p> <p>4 Q Other than the potential hernia that you're talking</p> <p>5 about, have you experienced --</p> <p>6 A I've been having the pains --</p> <p>7 Q So --</p> <p>8 A -- from the potential hernia.</p> <p>9 Q So after he performed the surgery, the colostomy</p> <p>10 reversal on you, is it your testimony that you're</p> <p>11 still having the same type of hernia pain that you</p> <p>12 were having when the original colostomy was performed?</p> <p>13 A Yes.</p> <p>14 Q So the colostomy reversal, Mr. Jackson, did not fix</p> <p>15 your stomach pain that you were experiencing before</p> <p>16 you had the reversal; correct?</p> <p>17 A No, it didn't. My colostomy reversal didn't fix the</p> <p>18 stomach pain, but it did fix a lot of other stuff.</p> <p>19 Q But you're still having pain; right?</p> <p>20 A Yeah, because I believe this is a potential hernia.</p> <p>21 Q Okay. And when did that pain with the hernia start?</p> <p>22 A The pain -- when did it start? Right after the</p> <p>23 surgery while I was healing up, in jail. Like, you</p> <p>24 know, I was just thinking, oh, maybe this is just</p> <p>25 trauma to my gut.</p>

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<p style="text-align: right;">Page 161</p> <p>1 Q I just want to know when it started, and you said it</p> <p>2 happened right after the surgery while you were in</p> <p>3 jail; correct?</p> <p>4 A Uh-huh. I don't know for sure if that's hernia pain</p> <p>5 but I'm just telling you about the pains I'm having.</p> <p>6 Q I guess my -- you're having the same type of pain with</p> <p>7 your colostomy reversal -- strike my question, because</p> <p>8 I want to be clear, because you added on some stuff.</p> <p>9 I just want to make sure I'm clear. And I respect</p> <p>10 that you wanted to clarify.</p> <p>11 My question is this: You're still having</p> <p>12 pain, even after the colostomy reversal surgery that</p> <p>13 you had in January of 2019, the same kind of pain that</p> <p>14 you were having immediately after you had your</p> <p>15 colostomy back in December of 2016; right?</p> <p>16 A Immediately after I had my colostomy? I wouldn't say</p> <p>17 -- I'm trying to clarify. I wouldn't say that it was</p> <p>18 immediately because I didn't know what kind of pain I</p> <p>19 was having until I healed up completely, because I was</p> <p>20 in pain. You get what I'm saying?</p> <p>21 Q I do but my question is a little more simple. The</p> <p>22 same pain that you were having after you had your</p> <p>23 colostomy --</p> <p>24 A I've been having that same pain the whole time. The</p> <p>25 whole time since. Yeah.</p>	<p style="text-align: right;">Page 163</p> <p>1 Q Did you ever treat with a medical provider in the</p> <p>2 MDOC?</p> <p>3 A No.</p> <p>4 Q You never saw a nurse?</p> <p>5 A See, you putting the treat word on there and I never</p> <p>6 received treatment. I partially got supplies some of</p> <p>7 the time. Like, you know, I mean they gave me</p> <p>8 supplies all the time but they wasn't always right. I</p> <p>9 didn't get no treatment. What treatment are you</p> <p>10 talking about?</p> <p>11 Q Mr. Jackson, I'm not talking about a colostomy</p> <p>12 reversal. What I'm talking about is, we have already</p> <p>13 been discussing throughout this deposition various</p> <p>14 instances where you were assessed by the people at the</p> <p>15 medical providers --</p> <p>16 A You mean assessed as far as what?</p> <p>17 Q You were seen by the --</p> <p>18 A And given my supplies.</p> <p>19 Q I haven't even finished my question, sir.</p> <p>20 MR. SCARBER: Counsel --</p> <p>21 MR. CROSS: Just let him finish the</p> <p>22 question.</p> <p>23 BY MR. SCARBER:</p> <p>24 Q Okay. We spent a lot of time talking about the</p> <p>25 various instances where the health care providers at</p>
<p style="text-align: right;">Page 162</p> <p>1 Q That's a great answer. I just didn't finish the</p> <p>2 question, so I don't know if --</p> <p>3 A You don't know if you want that one yet.</p> <p>4 Q I want it but I never asked the question. So I got to</p> <p>5 ask the question. Just remember what you just said.</p> <p>6 What you're telling me, Mr. Jackson, is</p> <p>7 that after your colostomy was performed in December</p> <p>8 2016, you were having some kind of pain that felt like</p> <p>9 a hernia pain at that time; correct?</p> <p>10 A I wouldn't say so. I don't know what hernia pain</p> <p>11 feels like. I'm telling you what Dr. Webber said it</p> <p>12 could be when I went to him.</p> <p>13 Q Okay. Well, let me rephrase the question again.</p> <p>14 After your colostomy reversal surgery</p> <p>15 that was done in 2016 (sic), you were experiencing</p> <p>16 some kind of pain that you're still experiencing after</p> <p>17 you had the colostomy reversal in June of 2019.</p> <p>18 A Uh-huh.</p> <p>19 Q Is that yes?</p> <p>20 A Yes, sir.</p> <p>21 Q Okay. So you -- we talked about the records from the</p> <p>22 MDOC where you received medical treatment while you</p> <p>23 were in the MDOC; correct?</p> <p>24 A I never said nothing about receiving no medical</p> <p>25 treatment at MDOC.</p>	<p style="text-align: right;">Page 164</p> <p>1 the MDOC saw you. For instance, they saw you when you</p> <p>2 came to the MDOC. They performed X-rays on you. They</p> <p>3 examined you. They provided you with colostomy</p> <p>4 supplies. They sent you to the emergency room when</p> <p>5 you had an injury near the area of your colostomy.</p> <p>6 They provided supplies to you after you left the MDOC</p> <p>7 so that you could have it after you were paroled from</p> <p>8 the MDOC. We talked about those various instances.</p> <p>9 A Okay. What about them?</p> <p>10 Q So my question for you is -- and, honestly, I think I</p> <p>11 forgot the question because I had to go and ask the</p> <p>12 question again. So just move to strike it altogether.</p> <p>13 I'll just rely on whatever you said. I know that's a</p> <p>14 good strategy but --</p> <p>15 A Yeah.</p> <p>16 Q The medical provider -- let me just ask the question</p> <p>17 this way. What I was doing was a question where I was</p> <p>18 just trying to lay some foundation for it. We've</p> <p>19 already talked about a number of times that you saw</p> <p>20 the MDOC health care providers and they did certain</p> <p>21 things for you. Do you ever recall talking with a</p> <p>22 doctor named Dr. Alsalman?</p> <p>23 A Do I recall?</p> <p>24 Q Yeah.</p> <p>25 A When did I talk with him?</p>

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<p style="text-align: right;">Page 165</p> <p>1 Q Do you recall talking to him?</p> <p>2 A It's a lot of doctors. I can't tell -- if you could</p> <p>3 give me something to remind me maybe I could recall</p> <p>4 it.</p> <p>5 Q When you first got to the jail -- I'm sorry -- to the</p> <p>6 prison, were you ever evaluated to determine whether</p> <p>7 or not it was medically necessary for you to have a</p> <p>8 colostomy reversal?</p> <p>9 A Was I ever evaluated when I first got to the jail?</p> <p>10 Yes.</p> <p>11 Q Okay.</p> <p>12 A To the prison?</p> <p>13 Q To the prison.</p> <p>14 A Yes.</p> <p>15 Q Okay. And are you aware that that particular health</p> <p>16 care provider made a request to -- that there be some</p> <p>17 kind of determination made of whether or not you would</p> <p>18 qualify or whether it was medically necessary for you</p> <p>19 to have --</p> <p>20 A No, I'm not aware.</p> <p>21 Q -- a colostomy reversal?</p> <p>22 A I'm not aware as far as (inaudible) --</p> <p>23 COURT REPORTER: I'm sorry. "I'm not</p> <p>24 aware as far as" --</p> <p>25 THE WITNESS: As far as I don't know.</p>	<p style="text-align: right;">Page 167</p> <p>1 further regarding getting any kind of medical</p> <p>2 procedure approved on your behalf?</p> <p>3 A I don't know.</p> <p>4 Q Are you aware of Dr. Alsalman submitting any kind of</p> <p>5 appeal regarding your request for an alternative</p> <p>6 treatment plan or a review of whether or not you would</p> <p>7 qualify for a surgery of medical necessity at all?</p> <p>8 A I don't know.</p> <p>9 Q Was this the only time it was ever discussed with you</p> <p>10 as to whether or not you would qualify for the</p> <p>11 surgery, from Dr. Alsalman?</p> <p>12 A I'm not for sure. I couldn't say yes for sure. I had</p> <p>13 a lot of medical stuff and staff -- stuff going on. I</p> <p>14 couldn't say for sure. Was it the only time or wasn't</p> <p>15 it, I couldn't say it. I don't remember. But I do</p> <p>16 remember that time for sure.</p> <p>17 Q And this wasn't even -- so it's fair to say, sir, that</p> <p>18 you had decided you were going to file a lawsuit</p> <p>19 within a month of even being at the prison because you</p> <p>20 couldn't have a colostomy reversal immediately; right?</p> <p>21 A No. I knew right away I was filing a lawsuit anyway</p> <p>22 for everything that had went on back at the jail.</p> <p>23 That's what I was referring to.</p> <p>24 Q Okay.</p> <p>25 A That I knew.</p>
<p style="text-align: right;">Page 166</p> <p>1 BY MR. SCARBER:</p> <p>2 Q Let me just go to something. I'm going to wrap up</p> <p>3 here, because I know Mr. Willis probably has a couple</p> <p>4 of follow-up questions, and I'm going to try to get</p> <p>5 done with this but this is taking longer than I</p> <p>6 wanted, obviously. No fault of --</p> <p>7 A It's fine.</p> <p>8 Q Dr. Alsalman was a doctor who has a note from April</p> <p>9 26, 2017. He says -- and this is at page 33 of the</p> <p>10 MDOC records -- that -- it says, quote, he's ready for</p> <p>11 a colostomy reversal for which a 407 was submitted on</p> <p>12 4/18/17 that got ATP for medical necessity, not</p> <p>13 demonstrated at this time. The patient was scheduled</p> <p>14 for today's appointment to discuss the ATP," which</p> <p>15 stands for alternative treatment plan. "He became so</p> <p>16 upset when told about the not approved consult request</p> <p>17 stating that he's planning to file a lawsuit."</p> <p>18 Do you recall a meeting with a Dr.</p> <p>19 Alsalman back in April of 2017 where he had advised</p> <p>20 you that he had submitted a request for them to</p> <p>21 determine whether or not it was medically necessary</p> <p>22 for you to have the procedure and that this incident</p> <p>23 occurred here? Do you recall that?</p> <p>24 A Yes, I do. Yes, I do. And here we are.</p> <p>25 Q And are you aware of Dr. Alsalman doing anything</p>	<p style="text-align: right;">Page 168</p> <p>1 Q Did Dr. Alsalman ever discuss with you that the reason</p> <p>2 we're not going to do the colostomy reversal is</p> <p>3 because it cost too much?</p> <p>4 A Who?</p> <p>5 Q Dr. Alsalman.</p> <p>6 A I never talked to Dr. Alsalman. Have I? Did I talk</p> <p>7 to Dr. Alsalman? Like, did he examine me in person?</p> <p>8 Did I see him in person?</p> <p>9 Q Yes. This was the visit that I just referred to you.</p> <p>10 A He did not examine me as a doctor. I had a meeting</p> <p>11 with someone and they told me that they decided not to</p> <p>12 reverse my bag. It wasn't -- it wasn't no one who</p> <p>13 examined me. It was someone who came in and I spoke</p> <p>14 it. So I'm a little confused.</p> <p>15 Q I have in my record that you were examined on March 24</p> <p>16 of 2017 by a nurse practitioner named Ronald Drinkert.</p> <p>17 A Okay. That's what I'm talking about.</p> <p>18 Q Do you remember that?</p> <p>19 A Vaguely. But what I'm saying is, the doctor that</p> <p>20 you're saying, I wasn't even aware he was a doctor. I</p> <p>21 remember meeting with someone that came in and spoke</p> <p>22 with me. I don't remember them examining me or being</p> <p>23 a doctor. It was someone that came in and spoke with</p> <p>24 me.</p> <p>25 Q In this particular case, Mr. Jackson, a determination</p>



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<p style="text-align: right;">Page 169</p> <p>1 was made by the health care providers here as to</p> <p>2 whether, based upon their medical judgment, they</p> <p>3 believed that you would qualify for medical necessity</p> <p>4 for a colostomy reversal.</p> <p>5 A You said they believed that I wouldn't?</p> <p>6 Q They believed that you would not.</p> <p>7 A Okay.</p> <p>8 Q Okay. Is it your testimony today that you disagree</p> <p>9 with their medical judgment about whether or not you</p> <p>10 should be getting a colostomy reversal or not?</p> <p>11 MR. CROSS: I'm going to object. I mean</p> <p>12 --</p> <p>13 THE WITNESS: (Inaudible) testimony today</p> <p>14 that I agree or don't agree?</p> <p>15 MR. CROSS: That's not in evidence that</p> <p>16 it was their medical judgment.</p> <p>17 MR. SCARBER: I'm going to object to a</p> <p>18 speaking objection.</p> <p>19 Let me ask you the question again. And</p> <p>20 this is subject to whatever objection you want to</p> <p>21 make. I'm free to ask this question.</p> <p>22 BY MR. SCARBER:</p> <p>23 Q In this particular case there was a decision made -- a</p> <p>24 medical decision made by the doctors in this</p> <p>25 particular case as to whether or not you would qualify</p>	<p style="text-align: right;">Page 171</p> <p>1 reversal would not be reversed were wrong about their</p> <p>2 decisions?</p> <p>3 A Doctors -- did doctors make medical decisions? I</p> <p>4 wasn't aware doctors made the medical decisions. I</p> <p>5 thought it was the jail, the prison that made the</p> <p>6 decision. I was never aware that doctors made the</p> <p>7 decision.</p> <p>8 Q You just testified a little while ago that Dr.</p> <p>9 Papendick you think is the doctor that determined that</p> <p>10 your colostomy wouldn't be reversed.</p> <p>11 A I just testified a little while ago that I never knew</p> <p>12 that it was a doctor that -- no one ever examined me.</p> <p>13 It was just a person came in and spoke with me.</p> <p>14 Q So let's assume for the record -- we don't have to do</p> <p>15 that. I'm going to show you record number -- page No.</p> <p>16 37. It's from the MDOC records. Down at the bottom</p> <p>17 of this particular page it says, "Medical necessity</p> <p>18 not demonstrated at this time. Continue to follow in</p> <p>19 on site clinically by MSP."</p> <p>20 A MSP. That's a yes. Okay. What about it?</p> <p>21 Q My question is -- and the record is signed by Dr.</p> <p>22 Papendick. So --</p> <p>23 A Uh-huh.</p> <p>24 Q So my question -- so my question is, do you disagree</p> <p>25 with Dr. Papendick's medical decision about whether a</p>
<p style="text-align: right;">Page 170</p> <p>1 for a colostomy reversal and they decided, based upon</p> <p>2 the reasons that are set forth in that document there</p> <p>3 that you reviewed, the grievance, that they did not</p> <p>4 believe there was a medical necessity demonstrated for</p> <p>5 a colostomy reversal. Is it your testimony today,</p> <p>6 then, that you disagree with their medical</p> <p>7 determination about whether or not --</p> <p>8 A So you said --</p> <p>9 Q Wait --</p> <p>10 A I'm just asking --</p> <p>11 Q I haven't asked the question.</p> <p>12 A So I can understand the question. Because I have a</p> <p>13 question about your question.</p> <p>14 Q So go ahead and ask me the question about my question.</p> <p>15 A Are you saying that doctors determined that my</p> <p>16 reversal was not medically necessary and are you</p> <p>17 asking me was I aware of the doctors saying that?</p> <p>18 Q Let me ask the question again, then.</p> <p>19 A Okay.</p> <p>20 Q Are you aware that there were medical doctors that</p> <p>21 determined that your colostomy was not going to --</p> <p>22 strike my question, because I need to say reversal.</p> <p>23 Strike that.</p> <p>24 Is it your testimony, Mr. Jackson, that</p> <p>25 doctors who made medical decisions that your colostomy</p>	<p style="text-align: right;">Page 172</p> <p>1 medical necessity was demonstrated at that time for a</p> <p>2 colostomy reversal?</p> <p>3 A I still -- you got to rephrase.</p> <p>4 Q Do you disagree with Dr. Papendick's medical</p> <p>5 determination that medical necessity was not</p> <p>6 demonstrated for you to have a reversal?</p> <p>7 A I don't agree or disagree. I don't know what you want</p> <p>8 me to say on that. It's not even -- I don't have no</p> <p>9 say-so or opinion because I don't know -- I really</p> <p>10 don't understand the question like that.</p> <p>11 Q Do you disagree with Dr. Papendick's medical judgment</p> <p>12 as to whether or not you needed a colostomy reversal?</p> <p>13 A (Inaudible).</p> <p>14 COURT REPORTER: I'm sorry, sir. You're</p> <p>15 mumbling. Can you --</p> <p>16 THE WITNESS: I'm sorry, ma'am. I'm just</p> <p>17 thinking to myself. When I talk quietly, that's just</p> <p>18 like me rehearsing something out loud, verbally in my</p> <p>19 head.</p> <p>20 Did you hear that?</p> <p>21 COURT REPORTER: Yeah, I did.</p> <p>22 BY MR. SCARBER:</p> <p>23 Q So what's your answer?</p> <p>24 A I forgot the question.</p> <p>25 Q Mr. Jackson, the question is this: Do you disagree</p>

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<p style="text-align: right;">Page 173</p> <p>1 with Dr. Papendick's medical judgment that you did not</p> <p>2 demonstrate a medical necessity for a colostomy</p> <p>3 reversal?</p> <p>4 A No.</p> <p>5 Q You don't disagree with --</p> <p>6 A I don't agree with him.</p> <p>7 Q You don't agree with him. Okay. You can leave your</p> <p>8 answer right there. That's fine.</p> <p>9 A I don't agree with him what? Ask the question again.</p> <p>10 Q You've answered it.</p> <p>11 A I'm saying I'm not answering that because -- I'm</p> <p>12 saying I'm -- that's not my answer because I don't</p> <p>13 know if I heard it correctly. So ask me one more time</p> <p>14 so I can know if I'm hearing it correctly.</p> <p>15 Q Do you disagree with Dr. Papendick's medical judgment</p> <p>16 that you did not require a colostomy reversal?</p> <p>17 A Yeah.</p> <p>18 Q Okay.</p> <p>19 A Yes. I feel like I did require it.</p> <p>20 Q Great. So you believe that -- is it fair to say that</p> <p>21 you believe that instead of treating you the way they</p> <p>22 did when you were in the MDOC in terms of giving you</p> <p>23 medical assessments, supplies, referring you to the</p> <p>24 ER, determining what type of supplies you might need,</p> <p>25 performing labs and X-rays, you believe that they</p>	<p style="text-align: right;">Page 175</p> <p>1 some meeting with Nurse Colleen?</p> <p>2 A Yes.</p> <p>3 Q How many meetings did you have with Nurse Colleen?</p> <p>4 A I know for sure we had a meeting with the sergeant.</p> <p>5 It wasn't Lebeau. The sergeant -- we had a meeting,</p> <p>6 Miss Colleen, the sergeant, and another sheriff. We</p> <p>7 had a meeting. I believe it was -- it was</p> <p>8 basically -- the meeting was about the fact that I</p> <p>9 wasn't receiving the correct supplies and Nurse</p> <p>10 Colleen told me that I was -- I would have to make do</p> <p>11 with one over ring a week because they couldn't afford</p> <p>12 them and I would have to use the paste to seal my</p> <p>13 patch, but I told them that the paste wasn't working.</p> <p>14 It was still leaking. The only thing that made it</p> <p>15 flush flat was the over ring, and that's why I showed</p> <p>16 you all my stomach earlier.</p> <p>17 Q Besides that meeting did you have any other</p> <p>18 conversations with Nurse Colleen about your colostomy?</p> <p>19 A Yes, I did. I talked to Nurse Colleen sometime in</p> <p>20 January -- no, no, no. I did. I talked to Nurse</p> <p>21 Colleen sometime in January. I talked to her the</p> <p>22 whole time but -- yeah, in January -- the beginning of</p> <p>23 January she told me that I was going to have the</p> <p>24 reversal -- that I was going to be reversed. And then</p> <p>25 she -- after all the confrontation, like the over</p>
<p style="text-align: right;">Page 174</p> <p>1 should have also been doing a colostomy reversal as</p> <p>2 well; right?</p> <p>3 A I believe they should have did the colostomy reversal.</p> <p>4 Q Instead of all the other stuff they were doing?</p> <p>5 A Yes.</p> <p>6 MR. SCARBER: Ken, I don't have anything</p> <p>7 else right at this time. You want to take a quick</p> <p>8 break? Do you have anything to follow up?</p> <p>9 MR. WILLIS: I probably -- I've got a</p> <p>10 couple of things to follow up, but it might also</p> <p>11 depend on if Ian has got any questions or not.</p> <p>12 MR. CROSS: Yeah, I do.</p> <p>13 VIDEOGRAPHER: Are we taking a break?</p> <p>14 MR. CROSS: Do you want to take a break?</p> <p>15 MR. SCARBER: Go ahead and ask your</p> <p>16 questions and then -- do you have a lot?</p> <p>17 MR. CROSS: I don't have that much.</p> <p>18 MR. SCARBER: Okay.</p> <p>19 - - -</p> <p>20 EXAMINATION</p> <p>21 BY MR. CROSS:</p> <p>22 Q Mr. Jackson, do you remember being asked some</p> <p>23 questions about a Nurse Colleen?</p> <p>24 A Yes.</p> <p>25 Q All right. And I believe you testified that you had</p>	<p style="text-align: right;">Page 176</p> <p>1 ring, I ended up deflating my catheter because I was,</p> <p>2 like, having real bad pains with my catheter. I have</p> <p>3 enlarged prostate and, like, when I was urinating I</p> <p>4 was having spasms and it was coming all around my</p> <p>5 catheter. I was in pain. They had me on medical</p> <p>6 lockdown. I met with Miss Colleen about the medical</p> <p>7 lockdown because it was, like, if you got sick in the</p> <p>8 jail or if you got hurt in the jail, they would lock</p> <p>9 you down, but that's the same thing that they do to</p> <p>10 people who get into fights or do disciplinary -- so I</p> <p>11 felt like I was being punished. I had a meeting with</p> <p>12 her. But then -- and I had a meeting with her about</p> <p>13 my over rings because they were leaking and during the</p> <p>14 end when it was time for me to get my reversal I</p> <p>15 talked with Miss Colleen about it because the nurses</p> <p>16 told me that somehow that she was going back and forth</p> <p>17 with Dr. Kansakar's office and they hadn't for sure</p> <p>18 came to some type of agreement. So when I talked to</p> <p>19 Nurse Colleen about it, she said, "Hey."</p> <p>20 I said, "What's going on, Miss Nurse</p> <p>21 Colleen?"</p> <p>22 She said, "Your surgery has been</p> <p>23 postponed for financial reasons."</p> <p>24 Q When did she say that?</p> <p>25 A She said that after my surgery had been postponed.</p>

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<p style="text-align: right;">Page 177</p> <p>1 After February 9th.</p> <p>2 Q Where did she say that? Where were you?</p> <p>3 A I was in the jail. I went to see go her in the</p> <p>4 medical line. You know, she come in. She do the</p> <p>5 medical line, whatever, whatever. Everybody line up.</p> <p>6 You know?</p> <p>7 I -- every time a nurse came in or a</p> <p>8 sergeant came in I wanted to talk to them.</p> <p>9 Q So I believe Mr. Scarber asked you some questions</p> <p>10 about a letter you got from the ombudsman office?</p> <p>11 A Uh-huh.</p> <p>12 Q Did you ever talk to anyone from the ombudsman office</p> <p>13 in person or did you just get a letter?</p> <p>14 A I got a letter and they said that what --</p> <p>15 Q Answer the question. Did you talk to them on the</p> <p>16 phone or did you just write letters?</p> <p>17 A Just write letters.</p> <p>18 Q So is there any information the ombudsman's office</p> <p>19 gave you beyond that letter that you were showed by</p> <p>20 Mr. Scarber?</p> <p>21 A I can't remember about that. I just know that they</p> <p>22 said they won't reverse my surgery because it was</p> <p>23 cosmetic; right? They don't do reconstructive -- they</p> <p>24 don't do reconstructive and cosmetic surgery.</p> <p>25 Q So all you heard from the ombudsman's office was that</p>	<p style="text-align: right;">Page 179</p> <p>1 employing medical judgment?</p> <p>2 A Do I know when that happened?</p> <p>3 Q Do you know if he was -- if it was a medical decision</p> <p>4 or not?</p> <p>5 A It was a financial thing the whole time. I know that.</p> <p>6 MR. CROSS: Okay. I don't have any</p> <p>7 further questions.</p> <p>8 THE WITNESS: Because -- I'm just saying</p> <p>9 it was a financial thing because they told me that if</p> <p>10 my family could pay for it, I would do outside</p> <p>11 resources, and they would do the surgery. That's how</p> <p>12 I know it was a financial thing. You know what I'm</p> <p>13 saying? Because they was going to do it. If I could</p> <p>14 afford to pay for it -- the people to get paid, like</p> <p>15 pay for the sheriff's overtime, if I could pay for the</p> <p>16 surgery, then they would have did it. But since I</p> <p>17 couldn't, I had to rely on them to pay for it. They</p> <p>18 said it was a medical issue -- it was a medical</p> <p>19 decision why they didn't do it.</p> <p>20 MR. CROSS: Okay. I have no further</p> <p>21 questions.</p> <p>22 MR. SCARBER: Hey, Ken, let me just</p> <p>23 follow up on that. Is that okay?</p> <p>24 MR. WILLIS: Sure.</p> <p>25 MR. SCARBER: Okay.</p>
<p style="text-align: right;">Page 178</p> <p>1 letter which we talked about earlier?</p> <p>2 A Yes, sir, that I can remember. Yes, sir, for sure.</p> <p>3 Q You were asked some questions about a Dr. Papendick.</p> <p>4 A Uh-huh.</p> <p>5 Q Do you remember that?</p> <p>6 A Yes.</p> <p>7 Q And have you ever met Dr. Papendick?</p> <p>8 A No, I haven't met Dr. Papendick.</p> <p>9 Q Have you ever done a telemedicine visit with Dr.</p> <p>10 Papendick?</p> <p>11 A No, I did not.</p> <p>12 Q Do you know what Dr. Papendick --</p> <p>13 A Looks like?</p> <p>14 Q Yeah.</p> <p>15 A No.</p> <p>16 Q Has Dr. Papendick ever provided you any medical</p> <p>17 treatment?</p> <p>18 A Of course not. I never saw the man. That's what I</p> <p>19 said. Somebody just came in and talked to me. Wasn't</p> <p>20 no doctor.</p> <p>21 Q You were asked some questions about disagreeing with</p> <p>22 medical judgment. Do you remember that?</p> <p>23 A Uh-huh. Yes, sir.</p> <p>24 Q Do you know if when Dr. Papendick decided that you</p> <p>25 should not have the colostomy reversal he was</p>	<p style="text-align: right;">Page 180</p> <p>1 - - -</p> <p>2 RE-EXAMINATION</p> <p>3 BY MR. SCARBER:</p> <p>4 Q Did Dr. Papendick specifically tell you that it was a</p> <p>5 medical decision that he wouldn't perform?</p> <p>6 A I never talked to Dr. Papendick a day in my life, so</p> <p>7 he couldn't have told me.</p> <p>8 Q Okay. Thank you.</p> <p>9 Where is the information that you got</p> <p>10 that said it was a financial decision?</p> <p>11 A I have some type of form that says that I can request</p> <p>12 outside services, and requested outside services</p> <p>13 meaning paying for all the expenses that my surgery</p> <p>14 costs, including paying the sheriff's overtime. Yes.</p> <p>15 Do I need to go find that? I need to do the break,</p> <p>16 because I can find that.</p> <p>17 Q I don't know if it applies to me. You said for the</p> <p>18 sheriff, and I'm not involved in that.</p> <p>19 My question, more directly to you is,</p> <p>20 where is the information while you were in the state</p> <p>21 prison that you got that indicated that it was a</p> <p>22 financial decision?</p> <p>23 A Where is the information while I was -- oh, yeah,</p> <p>24 that's what I'm talking about. When they told me --</p> <p>25 it wasn't about no sheriff. I had a meeting and I</p>

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<p style="text-align: right;">Page 181</p> <p>1 talked to some type of nurse or medical staff and they</p> <p>2 advised me that if I could have outside services --</p> <p>3 saying if my people can pay for the surgery and pay</p> <p>4 for the overtime of the police that would have to</p> <p>5 watch me at the hospital, then they would do it. But</p> <p>6 if I can't afford to request outside medical services,</p> <p>7 then they won't do it.</p> <p>8 Q Okay.</p> <p>9 A So that's how I knew it wasn't a medical thing. I</p> <p>10 knew it was a financial thing. Because if I could</p> <p>11 afford to pay for it, I would have been having it</p> <p>12 reversed before I got out of prison.</p> <p>13 Q So my question to you is, who specifically told you --</p> <p>14 A I read that on the paper. I can't --</p> <p>15 MR. CROSS: Let him finish the question.</p> <p>16 A All right. Go ahead.</p> <p>17 BY MR. SCARBER:</p> <p>18 Q So you testified that nobody specifically told you</p> <p>19 that. You saw it on a piece of paper.</p> <p>20 A No, no. Someone did tell me that. Excuse me.</p> <p>21 Someone did tell me that. I had a meeting. I went</p> <p>22 in, had the meeting at Jackson, I believe. I went in,</p> <p>23 had the meeting, because I had a meeting about my</p> <p>24 reversal and that's when they told me about the</p> <p>25 outside services -- I could request outside services</p>	<p style="text-align: right;">Page 183</p> <p>1 forms that you have to complete with respect to</p> <p>2 whether or not you could pay for it --</p> <p>3 A Outside -- requested outside medical services.</p> <p>4 Q Yeah. Where did those come from?</p> <p>5 A Where did they come from? What do you mean? I had a</p> <p>6 meeting with a lady about requesting outside medical</p> <p>7 services and everything.</p> <p>8 Q Do you remember when that meeting occurred,</p> <p>9 approximately?</p> <p>10 A I have to look in the medical records, but I know for</p> <p>11 sure that they're in there.</p> <p>12 Q Do you remember -- where did this meeting occur in the</p> <p>13 prison?</p> <p>14 A In health services.</p> <p>15 Q In health services?</p> <p>16 A Uh-huh. It was a nurse. A lady.</p> <p>17 Q Was it the same nurse that we're referencing here --</p> <p>18 A I don't know. I can't recall.</p> <p>19 Q -- on the grievance appeal response?</p> <p>20 A I can't recall, because I'm good with faces, not</p> <p>21 names. You show me her face, I might be able to tell</p> <p>22 you.</p> <p>23 Q So as we sit here today you would agree with me that</p> <p>24 you have no proof that you can think of that the</p> <p>25 person who told you about you could get a procedure</p>
<p style="text-align: right;">Page 182</p> <p>1 to have my people pay for it.</p> <p>2 Q So was the meeting with Dr. Papendick?</p> <p>3 A No. I never seen Dr. Papendick a day in my life.</p> <p>4 Q Okay. So then you're going to answer my next</p> <p>5 question. The meeting was not with Dr. Papendick that</p> <p>6 you're talking about; correct?</p> <p>7 A He wasn't there. I never seen him.</p> <p>8 Q So we can agree, Mr. Jackson --</p> <p>9 A If we agree.</p> <p>10 Q We can agree, Mr. Jackson, that Dr. Papendick did not</p> <p>11 tell you that it was a financial decision as to why he</p> <p>12 had determined that there was no medical necessity for</p> <p>13 your surgery?</p> <p>14 A I can't agree with that.</p> <p>15 Q If you can't agree with it, tell me when Dr. Papendick</p> <p>16 --</p> <p>17 A Oh, no, I never talked with Dr. Papendick, so, yeah, I</p> <p>18 do agree with that, because I never saw Dr. Papendick.</p> <p>19 Q Okay.</p> <p>20 A I'm sorry about that. Yeah, I never saw Dr.</p> <p>21 Papendick, so he couldn't tell me anything.</p> <p>22 Q Okay.</p> <p>23 A There we go.</p> <p>24 Q The document that you're talking about where you also</p> <p>25 received something in writing telling you about some</p>	<p style="text-align: right;">Page 184</p> <p>1 done as long as you pay for it yourself was somebody</p> <p>2 from Corizon or Dr. Papendick; correct?</p> <p>3 A You've got to rephrase that question.</p> <p>4 Q As you sit here today you can't show me anything that</p> <p>5 tells me specifically that it was someone from Corizon</p> <p>6 or Dr. Papendick, who you're suing in this case, that</p> <p>7 told you that --</p> <p>8 A You can request outside services?</p> <p>9 Q -- that the decision was financial not to perform your</p> <p>10 colostomy reversal?</p> <p>11 A You have to rephrase it again.</p> <p>12 Q Do you have anything to show me today that somebody</p> <p>13 from Corizon or Dr. Papendick told you specifically</p> <p>14 that it was financial as the reason as to why you</p> <p>15 could not have a colostomy reversal?</p> <p>16 A Yes.</p> <p>17 Q Okay. What?</p> <p>18 A I have documents that show that me paying for outside</p> <p>19 medical services, I would have been able to get my</p> <p>20 surgery done.</p> <p>21 Q Now, as we sit here today are you able to tell me that</p> <p>22 that was -- with one hundred percent certainty, that</p> <p>23 it was somebody from Corizon or Dr. Papendick that</p> <p>24 gave you that paperwork or told you that?</p> <p>25 A They gave me the paperwork or told me that? Rephrase</p>



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<p style="text-align: right;">Page 185</p> <p>1 the question.</p> <p>2 Q You said you have some paperwork talking about you</p> <p>3 could get your procedure done if you pay for it. So</p> <p>4 my question is --</p> <p>5 A Hold on. Let me clear that up for you, what I say. I</p> <p>6 said that I have paperwork stating that if I pay for</p> <p>7 or request outside services, outside medical services,</p> <p>8 that my surgery would be done and approved to be done.</p> <p>9 I have that.</p> <p>10 Q Where is it?</p> <p>11 A You got to give me a break and I have to find it.</p> <p>12 MR. SCARBER: Off the record.</p> <p>13 (There was a discussion off the record.)</p> <p>14 MR. SCARBER: Let's take a break. The</p> <p>15 videographer has to change it anyway.</p> <p>16 VIDEOGRAPHER: We are going off the</p> <p>17 record. It's 4:25 p.m.</p> <p>18 (Whereupon, a recess was held.)</p> <p>19 - - -</p> <p>20 VIDEOGRAPHER: We are back on the record.</p> <p>21 It is 4:35 p.m.</p> <p>22 BY MR. SCARBER:</p> <p>23 Q Mr. Jackson, we're back on the record. We took a</p> <p>24 brief pause. The court reporter -- videographer had</p> <p>25 to make a couple of changes -- video needed to be</p>	<p style="text-align: right;">Page 187</p> <p>1 decision regarding medical necessity or colostomy</p> <p>2 reversal is based upon financial reasons.</p> <p>3 A Yeah, because this right here says that I can request</p> <p>4 outside medical service and that means my family or</p> <p>5 someone can pay for my outside medical services.</p> <p>6 Meaning they would do the surgery if my family or</p> <p>7 someone pays for it on the outside. They would do it</p> <p>8 if they can afford the cost of the overtime for the</p> <p>9 sheriffs and the surgery that it cost, then they would</p> <p>10 do the surgery. This is a request, because that's</p> <p>11 what they do, that's their custom policy, to allow</p> <p>12 people on the outside to pay their medical bills.</p> <p>13 Q Show me --</p> <p>14 A Let's look this up. Because this paper is just a</p> <p>15 note. Let's look up what the outside medical -- let's</p> <p>16 look what that is -- what we're talking about here.</p> <p>17 MR. WILLIS: You're talking about in</p> <p>18 prison; correct?</p> <p>19 THE WITNESS: Yes, in prison.</p> <p>20 MR. WILLIS: You used the word sheriff</p> <p>21 again and I --</p> <p>22 THE WITNESS: I mean deputy, sorry.</p> <p>23 Deputy sheriff.</p> <p>24 MR. WILLIS: You mean corrections</p> <p>25 officer?</p>
<p style="text-align: right;">Page 186</p> <p>1 changed. During that time period you and your counsel</p> <p>2 met briefly and you provided me with what looks like</p> <p>3 three records. The first record is from -- looks like</p> <p>4 a Nurse Ausmus from the Michigan Department of</p> <p>5 Corrections. I guess this was in response to a kite,</p> <p>6 and it is dated 5/25/17.</p> <p>7 A '17?</p> <p>8 Q Yeah, May 25th of 2017. Can you take a look at that?</p> <p>9 And while you are reading that I'll just refresh the</p> <p>10 foundation here for our questions here. You were</p> <p>11 trying to find if there was something that</p> <p>12 specifically demonstrated that the Corizon defendants</p> <p>13 or Dr. Papendick told you or communicated to you that</p> <p>14 their decision was solely based on financial reasons.</p> <p>15 Do you see anything on that document that talks about</p> <p>16 a decision for you not to have a colostomy reversal</p> <p>17 being based upon financial reasons?</p> <p>18 A Yes. It speaks for itself.</p> <p>19 Q Okay. Let me take a look at it again.</p> <p>20 A It says outside medical resources. What I'm saying</p> <p>21 is, it's obviously --</p> <p>22 Q I don't want you to tell me what you think is obvious.</p> <p>23 I just want to know if there's something on this</p> <p>24 specific form that states that somebody from Corizon</p> <p>25 or Dr. Papendick told you specifically that their</p>	<p style="text-align: right;">Page 188</p> <p>1 THE WITNESS: Yeah, correction officer.</p> <p>2 MR. WILLIS: Okay. Sorry.</p> <p>3 MR. SCARBER: I'm sorry, Ken.</p> <p>4 BY MR. SCARBER:</p> <p>5 Q I guess my question is more simple. I'm just looking</p> <p>6 on this form. Can you show me the language where you</p> <p>7 say it is talk -- it's Corizon or Dr. Papendick</p> <p>8 telling you that it's a financial decision?</p> <p>9 A Show you on that paper? This is a paper --</p> <p>10 Q No. What I want you to do -- I know what the paper</p> <p>11 is.</p> <p>12 A Okay. What is --</p> <p>13 Q Show me where you see on that paper --</p> <p>14 A Dr. Papendick's name or something?</p> <p>15 Q -- that it says specifically something about a</p> <p>16 financial decision.</p> <p>17 A A financial decision? Wait. It says, "Schedule nurse</p> <p>18 sick call approximately 5/30/2017 with RN nurse by</p> <p>19 Christine" -- how do you pronounce her last name?</p> <p>20 Q I'm going to assume it's Ausmus.</p> <p>21 A -- Ausmus -- with Christine Ausmus, RN. Reason:</p> <p>22 Request outside medical service kite. No. 1, I am</p> <p>23 requesting outside medical service to schedule -- to</p> <p>24 schedule a colostomy reversal operation as soon as</p> <p>25 possible.</p>

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<p>1 So that's -- so I'm requesting for my</p> <p>2 people to pay for me to get reversed. You know? This</p> <p>3 is something you can do. This is procedure that they</p> <p>4 do in prison. I could have paid for it. I couldn't</p> <p>5 afford it, so they didn't do it. So that's what I'm</p> <p>6 showing you. That's my evidence.</p> <p>7 Q Let me help you out here. Let's see about -- you</p> <p>8 would agree with me, though, on the page that you just</p> <p>9 showed me, that nothing about financial is listed;</p> <p>10 correct?</p> <p>11 A Financial?</p> <p>12 Q There's nothing about payment or financial listed on</p> <p>13 here. You would agree?</p> <p>14 A It says --</p> <p>15 Q And if it's not there, it's okay to admit it.</p> <p>16 A No, no, no, I'm going to admit the truth. There's no</p> <p>17 problem. But it does not say nothing about financial</p> <p>18 or medical, but -- it's obvious. What's understood</p> <p>19 don't have to be explained. There you go.</p> <p>20 Q So we can agree that page 23 does not use the words</p> <p>21 financial or payment on it; correct?</p> <p>22 A It doesn't have it, financial or payment.</p> <p>23 Q That's fine.</p> <p>24 A Yeah.</p> <p>25 Q Now let's go to page 22. You read that and then I'm</p>	<p>1 A Yes.</p> <p>2 Q Okay. So the procedure has to be something that's</p> <p>3 approved?</p> <p>4 A Yes.</p> <p>5 Q Okay.</p> <p>6 A So you have to have the money to be able to get it</p> <p>7 approved. You have to have the money to pay all costs</p> <p>8 to have it approved. So it didn't get approved</p> <p>9 because I didn't have money.</p> <p>10 Q Does that approval for you, as far as your</p> <p>11 understanding of it, has nothing to do with whether or</p> <p>12 not it's something that is medically necessary for</p> <p>13 you; correct?</p> <p>14 A Rephrase the question.</p> <p>15 Q Does approval in your mind have anything to do with</p> <p>16 whether or not it's medically necessary?</p> <p>17 A Approval in my mind?</p> <p>18 Q So it says you will be responsible for all costs if</p> <p>19 approval for the request is granted. Right?</p> <p>20 A Uh-huh.</p> <p>21 Q So does this suggest to you that it's still something</p> <p>22 that has to be approved in order for you to ultimately</p> <p>23 be responsible for the cost?</p> <p>24 A Yes, it has to be approved. It doesn't say nothing</p> <p>25 about medical -- medical approval. It just says</p>
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<p>1 going to ask you some questions. Don't answer</p> <p>2 anything yet because I haven't asked you.</p> <p>3 A "Spoke with" --</p> <p>4 Q Just read it to yourself.</p> <p>5 A Oh, read it to myself.</p> <p>6 Q And then I'm going to ask you some questions.</p> <p>7 A Okay. Okay. That's what I thought.</p> <p>8 It says --</p> <p>9 Q So my question for you is, you would agree that it</p> <p>10 says at the bottom that this document was generated by</p> <p>11 Christine Ausmus, RN; correct?</p> <p>12 A Yes, but I also see something about Paul Stone</p> <p>13 (phonetic) here, too.</p> <p>14 Q Would you agree with me, Mr. Jackson, that this</p> <p>15 document says it was generated by Christine Ausmus,</p> <p>16 RN? Yes or no?</p> <p>17 A Yes.</p> <p>18 Q Now, there is a portion on here that you want to read</p> <p>19 to me. Can you go ahead and read it?</p> <p>20 A "It was explained that any request should be submitted</p> <p>21 to the HUM on kite form and that prisoner will be</p> <p>22 responsible for all costs incurred if above request is</p> <p>23 granted."</p> <p>24 Q So does this indicate to you, sir, that -- does it</p> <p>25 specifically say if approval for request is granted?</p>	<p>1 approved.</p> <p>2 Q Okay. And it also says generated by Christine Ausmus;</p> <p>3 right?</p> <p>4 A That's what the document says.</p> <p>5 Q Okay. The second document you handed me is page 122</p> <p>6 of the MDOC records. Just read it.</p> <p>7 A Okay.</p> <p>8 Q Okay. Does this particular document, Mr. Jackson, say</p> <p>9 anything on here about cost and payment, yes or no?</p> <p>10 Do you see those words listed here at all?</p> <p>11 A Okay. So I don't see anything about cost on here.</p> <p>12 Q Or payment; correct?</p> <p>13 A Correct.</p> <p>14 Q Thank you.</p> <p>15 A You welcome.</p> <p>16 Q Do you know how much your surgery cost with Dr.</p> <p>17 Webber, your reversal surgery?</p> <p>18 A No, sir, I'm not aware.</p> <p>19 Q Did your family pay for it?</p> <p>20 A No, sir.</p> <p>21 Q What does your grandmother do?</p> <p>22 A She's retired.</p> <p>23 Q What is your grandmother's income?</p> <p>24 A I wouldn't know that. You'd have to ask her.</p> <p>25 Q You're not on your grandmother's medical insurance,</p>

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<p style="text-align: right;">Page 193</p> <p>1 are you?</p> <p>2 A No.</p> <p>3 Q What's your sister's name?</p> <p>4 A Fatima Jackson.</p> <p>5 Q And how old is Fatima Jackson?</p> <p>6 A Forty.</p> <p>7 Q What other relative did you have at the time you were</p> <p>8 in the -- you were in the Michigan Department of</p> <p>9 Corrections?</p> <p>10 A What do you mean? I have a lot of relatives.</p> <p>11 Q I'm sorry. What other relative that you had that was</p> <p>12 going to be in a position to pay for you to have a</p> <p>13 medical procedure done?</p> <p>14 A What do you mean? I didn't know that unless I asked</p> <p>15 them. I didn't get to that point where I could have</p> <p>16 asked my family about paying for the medical treatment</p> <p>17 or anything like that.</p> <p>18 Q So you had never spoken with your family about paying</p> <p>19 for you to have a colostomy reversal, being</p> <p>20 hospitalized and undergoing any kind of procedures for</p> <p>21 a colostomy reversal while you were in the --</p> <p>22 A No, I did not because I didn't feel that was their</p> <p>23 responsibility because I wasn't in their custody. I</p> <p>24 was in the custody of St Clair County or MDOC.</p> <p>25 Q Okay. So you just indicated, sir, that you had not</p>	<p style="text-align: right;">Page 195</p> <p>1 A Yes, I do.</p> <p>2 Q And you also agree with me, then, that you feel like</p> <p>3 it was the responsibility of the MDOC to pay for your</p> <p>4 procedure.</p> <p>5 A Just because I was in their custody.</p> <p>6 Q Okay. That's -- I think we've answered our questions,</p> <p>7 then, about whether financial payment of your --</p> <p>8 whether you financially paying for your own procedure</p> <p>9 was even in play while you were in MDOC.</p> <p>10 A What do you mean?</p> <p>11 Q You weren't going to pay for it and you hadn't even</p> <p>12 talked to your family about paying for it; correct?</p> <p>13 A Yeah, I hadn't talked to my family about paying for it</p> <p>14 and I couldn't pay for it. I couldn't pay for it.</p> <p>15 Not that I wasn't going to pay for it. I couldn't.</p> <p>16 I'm not even sure my family could but I didn't want to</p> <p>17 put that responsibility on them.</p> <p>18 Q Okay. I'm going to move on, then.</p> <p>19 A Okay.</p> <p>20 Q You indicated that you had not seen a doctor or</p> <p>21 medical provider prior to your colostomy reversal</p> <p>22 being determined to not be medically necessary by Dr.</p> <p>23 Papendick; correct?</p> <p>24 A Huh? Rephrase your question.</p> <p>25 Q Did you indicate earlier that you had not seen a</p>
<p style="text-align: right;">Page 194</p> <p>1 spoken with your family about paying for the procedure</p> <p>2 and that you did not have a means of paying for the</p> <p>3 procedure; correct?</p> <p>4 A Right. I didn't feel it to be their responsibility</p> <p>5 and I didn't want to put that on them.</p> <p>6 Q So your position is not that you could have paid for</p> <p>7 it but your position is that you feel like the MDOC</p> <p>8 should have been the responsible party for paying for</p> <p>9 it; correct?</p> <p>10 A What you mean, not that I could have paid for it? I</p> <p>11 don't understand.</p> <p>12 Q You're not saying that you could have paid for you to</p> <p>13 have a procedure done for a colostomy reversal while</p> <p>14 you were in MDOC.</p> <p>15 A I'm not saying that.</p> <p>16 Q Correct?</p> <p>17 A What you mean? I didn't say anything. Why you asking</p> <p>18 what I said?</p> <p>19 Q Are you saying that -- you agree with me, Mr. Jackson,</p> <p>20 that you could not pay for a procedure to be done</p> <p>21 while you were in the MDOC; correct?</p> <p>22 A Yeah. I agree with you that I couldn't do that, yes.</p> <p>23 Q You also agree with me that you had not even spoken</p> <p>24 with your family about paying for a procedure while</p> <p>25 you were in MDOC.</p>	<p style="text-align: right;">Page 196</p> <p>1 medical provider or been examined by a medical</p> <p>2 provider prior to Dr. Papendick determining that it</p> <p>3 wasn't medically necessary for you to have a procedure</p> <p>4 -- a colostomy reversal procedure?</p> <p>5 A You got to rephrase the question again.</p> <p>6 Q There's a medical note in your chart at pages 43</p> <p>7 through 45 of your MDOC medical records and it's a</p> <p>8 visit with Dr. Alsalman that occurs on 4/18/2017.</p> <p>9 April 18, 2017. I think you recalled talking with Dr.</p> <p>10 Alsalman at one point; right?</p> <p>11 A I couldn't -- it's been years ago, but if it's noted,</p> <p>12 I probably did talk to him.</p> <p>13 Q Okay. The record indicates that 12 -- December 10,</p> <p>14 2016 you had a resection of your rectum, a bladder</p> <p>15 repair, and a colonoscopy. It also indicates that you</p> <p>16 are currently doing well having a functional</p> <p>17 colostomy. You denied abdominal pain or UTIs and it</p> <p>18 says that you were ready for a colostomy reversal.</p> <p>19 Does that -- so far that's accurate; correct?</p> <p>20 A That's correct. But I don't -- it hadn't -- but I'm</p> <p>21 telling you the whole exact time I told them about the</p> <p>22 pains I was having, so... You know what I mean?</p> <p>23 Q So it also indicates that there was a physical</p> <p>24 examination performed on you.</p> <p>25 A Uh-huh.</p>

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<p style="text-align: right;">Page 197</p> <p>1 Q It says that you were in no apparent distress. You 2 were well nourished and well developed. Respiratory 3 was normal. Cardiovascular was normal. But they get 4 an inspection of your abdomen. You had normal 5 abdominal muscles. Your abdomen was soft and 6 nontender. No large organs or anything like that. No 7 enlargements, no swelling. You did have a scar. They 8 noted that you had your colostomy in place. They also 9 noted there was no abdominal tenderness, no liver 10 enlargement, no spleen enlargement and no palpable 11 masses. 12 Are you denying, sir, that you were not 13 physically examined on or about April the 18th of 14 2017? 15 A No, I'm not denying that. 16 Q Okay. 17 A April 18. I'm not denying that. If they say they did 18 it, they did it. 19 Q Could you take a look at that document again that is 20 the grievance that was responded to by the MDOC? And 21 in this particular grievance response it looks like 22 Nurse Aiken, in response to the grievance, is looking 23 at medical records and she indicates here that based 24 upon her review of the medical records it didn't show 25 a medical reason for the reasons she's outlined as to</p>	<p style="text-align: right;">Page 199</p> <p>1 trying to figure out where is this coming from. How 2 would they just -- you know what I saying? Saying 3 what they want you to say. I never said nothing about 4 body issues. My whole issue was about the way I had 5 to go to the bathroom. 6 Q You also indicate that you had a problem with the way 7 other inmates were -- 8 A Reacting. 9 Q -- were reacting to you; right? 10 A Yes. Yes. 11 Q It also says on here that your colostomy was 12 functional, which you talked about. It indicates that 13 they reviewed radiology studies on April 7th or -- 14 taken on April 7, 2017, which showed no issues with 15 the colostomy. 16 A Uh-huh. 17 Q And it looks like, based upon this particular document 18 and the records that they reviewed, these are some of 19 the things that led them to the reasons that they 20 didn't feel like it was a medical necessity. Now, my 21 question for you is, you're disagreeing with the 22 medical reasons that they are stating here as to why 23 they don't think a colostomy is necessary; correct? 24 A You said it. 25 Q You disagree, Mr. Jackson, with the medical reasons</p>
<p style="text-align: right;">Page 198</p> <p>1 why you should not have a reversal. Now, she 2 indicates that -- 3 A That's not the way it's written. It says that -- you 4 want to read it? 5 Q Well, I'll tell you what. Let me rephrase the 6 question. In this particular document, Dr. -- I'm 7 sorry -- Nurse Aiken indicates in here that they have 8 reviewed your records to determine if there was a 9 medical necessity for your procedure, and what she 10 indicates here is that the records show that your 11 colostomy was in good status. You were able to 12 complete self care, which we talked about. It 13 indicates that you did have a great degree of body 14 image issue concerns. 15 A Where -- body issue concerns. And that's the thing, 16 where are you getting that from? That's, like, 17 slander because I never at one time told anybody I was 18 having any body issue concerns. That's just something 19 they just put in here and you read through it like I 20 said it. 21 Q Well, this is in your medical records. 22 A I mean, that's stuff that they put in the records, but 23 I never said it. It doesn't say he had -- see, all 24 these people are saying that I have body images but I 25 never one time told anybody that. That's why I'm</p>	<p style="text-align: right;">Page 200</p> <p>1 that they're giving here as to why you don't need a 2 colostomy reversal; right? It's okay if you -- 3 A It's okay if I say what you want me to say. 4 Q Do you disagree -- 5 A I'm trying to think of the question before I agree or 6 disagree so I have it clear. 7 Q Do you need me to repeat the question here? 8 A I mean, it wouldn't hurt. 9 Q Do you disagree with the medical reasons that they 10 list here as to why they don't think that you require 11 a colostomy reversal? 12 A I disagree with some of the reasons. 13 Q Okay. That's all I need for you to say. 14 My next question for you is, they 15 indicate here specifically that, quote, the Michigan 16 Department of Corrections, MDOC, doesn't reverse 17 colostomies unless it is medically necessary. The 18 surgery you are requesting is nonessential. Current 19 documentation reflects the colostomy is functional." 20 So you disagree, Mr. Jackson, that it was 21 not medically necessary for you to have a colostomy 22 reversal? 23 A Yes. 24 Q Okay. 25 A That it was not.</p>



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<p style="text-align: right;">Page 201</p> <p>1 Q You disagree with their decision here, based upon</p> <p>2 their review of the medical records, that it was not</p> <p>3 medically --</p> <p>4 MR. CROSS: The questioning is vague in</p> <p>5 that we haven't defined medical necessity.</p> <p>6 MR. SCARBER: My question is -- and I</p> <p>7 think you -- now you've made a speaking objection.</p> <p>8 BY MR. SCARBER:</p> <p>9 Q My question is this: I've just cited to you various</p> <p>10 instances here where they're talking about the medical</p> <p>11 records and they're talking about the reasons from a</p> <p>12 medical standpoint why they don't think the reversal</p> <p>13 is warranted.</p> <p>14 A Okay.</p> <p>15 Q And you disagree with that; right?</p> <p>16 A I feel -- listen, I feel like it was medically</p> <p>17 necessary for me to be reversed.</p> <p>18 Q So you feel like in their judgment they should have</p> <p>19 determined that it was medically necessary?</p> <p>20 A I can't say that. You can't put words in my mouth,</p> <p>21 sir. You do that a lot.</p> <p>22 MR. SCARBER: Move to strike.</p> <p>23 BY MR. SCARBER:</p> <p>24 Q You've had more than every opportunity to change the</p> <p>25 questions, have me repeat the questions. I've given</p>	<p style="text-align: right;">Page 203</p> <p>1 THE WITNESS: Yeah, I understand that.</p> <p>2 BY MR. SCARBER:</p> <p>3 Q I don't have any -- let me ask you a question here.</p> <p>4 Do you know a Larry Cowan or Cowen?</p> <p>5 A I have to see a picture. I'm good with faces, not</p> <p>6 names.</p> <p>7 Q Have you ever been -- has anybody ever come to you,</p> <p>8 Mr. Jackson, and said, "Hey, I had a situation in the</p> <p>9 jail where they wouldn't reverse my colostomy</p> <p>10 reversals (sic), too?" Anybody ever specifically come</p> <p>11 up and tell you that?</p> <p>12 A Yeah.</p> <p>13 Q And I used the wrong -- let me ask the question</p> <p>14 because I said jail.</p> <p>15 A I said yes.</p> <p>16 Q I need to -- I got to reask the question because I</p> <p>17 said jail and I meant to say prison, and I know</p> <p>18 there's a distinction and Mr. Willis is going to ask</p> <p>19 me to correct it at some point or have it corrected.</p> <p>20 So my question is, did any inmate or any</p> <p>21 former inmate ever come up to you personally, Mr.</p> <p>22 Jackson, and say to you that they had an issue while</p> <p>23 they were in the MDOC where they did not have their</p> <p>24 colostomy reversed?</p> <p>25 A Yes.</p>
<p style="text-align: right;">Page 202</p> <p>1 you the opportunity to answer every last question that</p> <p>2 I've given you. I've gone way beyond.</p> <p>3 A This is the only thing I want to say: When you ask</p> <p>4 the questions, you give me the answer before you ask</p> <p>5 the question. You say, "It's fair to say that you're</p> <p>6 drunk." You know what I mean? You give me -- you</p> <p>7 answer the questions before you even ask. I just want</p> <p>8 you to ask the questions.</p> <p>9 Q Your attorney is here and he has gone to law school</p> <p>10 and passed a very vigorous bar exam in Michigan so</p> <p>11 that he can understand what the law is and what the</p> <p>12 legal requirements are and the way that I can ask a</p> <p>13 question, not ask a question. If he thinks that my</p> <p>14 form is improper, he has to object. If he does not</p> <p>15 object, then you've got to answer. And I don't think</p> <p>16 I've gotten a whole lot of objections here.</p> <p>17 A See, the thing is, it's all about how you asking the</p> <p>18 question. You already answered --</p> <p>19 MR. CROSS: Kohchise, listen to me. He</p> <p>20 is allowed to ask the questions the way he is asking</p> <p>21 them.</p> <p>22 THE WITNESS: Okay.</p> <p>23 MR. CROSS: And you just have to listen</p> <p>24 to him ask the question and then answer it. Even if I</p> <p>25 object, you still have to answer it.</p>	<p style="text-align: right;">Page 204</p> <p>1 Q Who?</p> <p>2 A I don't know his name but there is a guy in there that</p> <p>3 wanted his colostomy reversed and they didn't reverse</p> <p>4 it.</p> <p>5 Q What facility did you see him in?</p> <p>6 A St. Louis.</p> <p>7 Q Where is the St. Louis facilities?</p> <p>8 A St. Louis, Michigan.</p> <p>9 Q And when did that occur?</p> <p>10 A It was at the end of my (inaudible) --</p> <p>11 COURT REPORTER: I'm sorry. The end of</p> <p>12 my what?</p> <p>13 THE WITNESS: Not too long before I went</p> <p>14 home. So it had to be in two thousand and sometime in</p> <p>15 '18, '19.</p> <p>16 BY MR. SCARBER:</p> <p>17 Q Anybody else?</p> <p>18 MR. WILLIS: Yeah, I've got some</p> <p>19 questions.</p> <p>20 MR. SCARBER: No. Any --</p> <p>21 MR. WILLIS: I'm sorry. I thought after</p> <p>22 that long pause there, I thought --</p> <p>23 BY MR. SCARBER:</p> <p>24 Q Any other people, Mr. Jackson, other than the guy you</p> <p>25 are talking about at the St. Louis facility?</p>

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<p style="text-align: right;">Page 205</p> <p>1 A That I -- that didn't get -- that's the guy that I</p> <p>2 knew for sure.</p> <p>3 Q Was his name Larry Cowan?</p> <p>4 A Larry Collin. Larry Collin.</p> <p>5 Q Cowan, C-O-W-A-N.</p> <p>6 A I couldn't say for sure because everybody call each</p> <p>7 other by nicknames unless you in the same unit.</p> <p>8 Q What was your nickname?</p> <p>9 A Everybody called me Kohchise. You know what I mean?</p> <p>10 Q So do you remember the nickname that you called</p> <p>11 this other gentleman?</p> <p>12 A Yeah. We called him "O," I believe.</p> <p>13 Q "O"?</p> <p>14 A Yeah, "O." I believe. That could have been -- so I</p> <p>15 couldn't tell you for sure if that was this guy. It</p> <p>16 might turn out his name is Larry. I don't know.</p> <p>17 Because you really don't know people's government name</p> <p>18 in prison.</p> <p>19 Q So was he the only guy?</p> <p>20 A What you mean, only guy?</p> <p>21 Q The only guy that ever came to you and you had a</p> <p>22 conversation with about that never -- didn't get his</p> <p>23 colostomy reversed?</p> <p>24 A Yeah, that I can recall. The guy that I can remember.</p> <p>25 Q Do you know exactly what his medical records stated or</p>	<p style="text-align: right;">Page 207</p> <p>1 colostomy bags. That had them in the past. You know</p> <p>2 what I mean? One guy had it on. Yeah, I recall a few</p> <p>3 people.</p> <p>4 Q Were they all at the same facility or different</p> <p>5 facilities?</p> <p>6 A I was only at two facilities.</p> <p>7 Q So would they have all been at St. Louis or would they</p> <p>8 have been at another facility?</p> <p>9 A They were at both.</p> <p>10 Q But Mr. -- but "O" in the St. Louis facility is the</p> <p>11 only person you specifically remember coming up to you</p> <p>12 and you guys talking about a colostomy --</p> <p>13 A Yes.</p> <p>14 MR. SCARBER: I don't have anything</p> <p>15 further at this time. I'll pass the witness.</p> <p>16 - - -</p> <p>17 RE-EXAMINATION</p> <p>18 BY MR. WILLIS:</p> <p>19 Q Mr. Jackson, I just have a few more questions for you.</p> <p>20 A No problem.</p> <p>21 Q Who gave you your colostomy supplies while you were at</p> <p>22 the St. Clair County Jail?</p> <p>23 A Oh, that was the thing. Speaking of colostomy</p> <p>24 supplies while I was at the St. Clair County Jail,</p> <p>25 they had -- I would go get them from the deputy and it</p>
<p style="text-align: right;">Page 206</p> <p>1 what his specific --</p> <p>2 A How would I know that?</p> <p>3 Q -- issues were?</p> <p>4 A No.</p> <p>5 Q So you don't really know whether his medical issues</p> <p>6 were exactly the same as yours; correct?</p> <p>7 A No, sir.</p> <p>8 Q What about Larry Cowan?</p> <p>9 A You just asked. He could be Larry Cowan.</p> <p>10 Q So your attorney has mentioned two people, Larry Cowan</p> <p>11 and Keith Swift. Do you know a Keith Swift? Could he</p> <p>12 be "O", too.</p> <p>13 A I know he ain't "O".</p> <p>14 Q Do you know him personally?</p> <p>15 A No, I'm just saying if his name is Keith Swift, that's</p> <p>16 a name I would remember.</p> <p>17 Q But what if he had a nickname, though?</p> <p>18 A If he had a nickname, then -- what about it?</p> <p>19 Q I'm saying would you remember --</p> <p>20 A His nickname?</p> <p>21 Q Yeah.</p> <p>22 A Yeah, if he had a colostomy bag, I'm sure I would.</p> <p>23 Q How many people in the MDOC that you encountered that</p> <p>24 had a colostomy bag while you were there?</p> <p>25 A A guy for sure -- I counted a few people that had</p>	<p style="text-align: right;">Page 208</p> <p>1 was some little -- it didn't even fit me. I had to</p> <p>2 cut it out with some kid scissors, like the stoma</p> <p>3 part. Yeah, they gave me the cheapest thing they</p> <p>4 could find in there. I had to cut them out. But when</p> <p>5 I got to prison, they had -- the patches were already</p> <p>6 pre-holes in them to fit your stoma. But when I was</p> <p>7 in St. Clair County, they would give you a pair of kid</p> <p>8 scissors. And when I brought it up to the deputy</p> <p>9 officer -- you would have to try cut out a perfect</p> <p>10 circle or cut around the pouch to make it fit your</p> <p>11 stoma, and you know I could never get it right.</p> <p>12 Sometimes I'd cut a star or a heart, triangle. That's</p> <p>13 when I really be having bad problems with the feces</p> <p>14 packing around my stoma.</p> <p>15 Q So I guess your answer is, it's the deputies are the</p> <p>16 ones who gave you the colostomy supplies?</p> <p>17 A No. I -- Nurse Colleen and the medical staff are the</p> <p>18 ones who dropped them off in my unit, for sure. And I</p> <p>19 just went and got them one at a time from the deputy</p> <p>20 when I needed to change them.</p> <p>21 Q Okay. So there were -- as far as you know they were</p> <p>22 brought to your unit by the medical staff but it was</p> <p>23 deputies who gave them to you each time?</p> <p>24 A Yes.</p> <p>25 Q Is that your testimony?</p>

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<p style="text-align: right;">Page 209</p> <p>1 A Yes. I saw the medical staff bring them in.</p> <p>2 Q And you previously testified that Nurse Colleen said</p> <p>3 the reversal surgery was postponed for financial</p> <p>4 reasons. Do you remember that?</p> <p>5 A Yes.</p> <p>6 Q Do you have any evidence that Nurse Colleen said that</p> <p>7 the reversal surgery was postponed for financial</p> <p>8 reasons?</p> <p>9 A Everything was verbal between me and her.</p> <p>10 Q So you've never seen anything in writing or from</p> <p>11 anybody else that it was a financial reason?</p> <p>12 A Everything I had to do with Nurse Colleen was verbal.</p> <p>13 Everything was said.</p> <p>14 Q Well, you would send medical kites; right?</p> <p>15 A Yes, but I never talked to Nurse Colleen medically --</p> <p>16 I mean, electronically. It was always verbal.</p> <p>17 Q So you would agree that you don't have any evidence</p> <p>18 that Nurse Colleen made the decision that the reversal</p> <p>19 surgery would be postponed for financial reasons;</p> <p>20 correct?</p> <p>21 A Wrong. In fact, I have every right to believe Nurse</p> <p>22 Colleen postponed it for medical reasons. Would you</p> <p>23 like to know why?</p> <p>24 Q Postponed for medical reasons?</p> <p>25 A I mean postponed for financial reasons.</p>	<p style="text-align: right;">Page 211</p> <p>1 catheter, she was mad -- really mad at me. I think</p> <p>2 that was like the straw that broke the camel's back.</p> <p>3 Like, you know? Because we had a couple run-ins about</p> <p>4 the medical supply and then another time my stomach</p> <p>5 had bust open right after surgery and they called her</p> <p>6 down to my room and she told me that usually people</p> <p>7 that have stitches and stuff, they get, like, a mucous</p> <p>8 plug or whatever -- something. You know what I mean?</p> <p>9 Just bust open. That's, like, normal, but it was</p> <p>10 bleeding all over. So that was like the first</p> <p>11 incident.</p> <p>12 And then we had -- I mean, that was like</p> <p>13 the first incident, then we had a disagreement about</p> <p>14 the medical supplies and she didn't want to give me</p> <p>15 the over ring, but when I deflated my catheter, that</p> <p>16 was it. I had to apologize to her and everything just</p> <p>17 to come off lockdown and act like everything was okay.</p> <p>18 And then I was just waiting on my surgery and then</p> <p>19 they said it's been postponed and I have to talk to</p> <p>20 Nurse Colleen about it, and when I talked to her about</p> <p>21 it, that's what she told me.</p> <p>22 Q You mentioned your catheter. The medical record says</p> <p>23 you pulled it out on December 18, 2016. Is that</p> <p>24 correct?</p> <p>25 A I didn't pull it out. I deflated it and then took it</p>
<p style="text-align: right;">Page 210</p> <p>1 Q No. I want to see your evidence. That's what I want</p> <p>2 to see.</p> <p>3 A You want to see my evidence?</p> <p>4 Q Did you write it in a kite?</p> <p>5 A Yeah. I wrote plenty grievances about her.</p> <p>6 Q Did you write in a kite anywhere that the surgery was</p> <p>7 postponed for financial reasons?</p> <p>8 A I told them that the surgery was postponed for</p> <p>9 personal reasons. For personal reasons. She told me</p> <p>10 financial. But it was personal reasons, what I put.</p> <p>11 Q So is it your testimony that you're assuming that</p> <p>12 Nurse Colleen postponed the --</p> <p>13 A I'm not a --</p> <p>14 Q -- surgery because of personal reasons?</p> <p>15 A I'm not assuming. I'm going off of her actions. But,</p> <p>16 yeah, I guess you --</p> <p>17 Q Did Nurse Colleen tell you that she was mad at you and</p> <p>18 as a result she was going to --</p> <p>19 A No.</p> <p>20 Q -- postpone your surgery and tell you it was for</p> <p>21 financial reasons?</p> <p>22 A She never said that.</p> <p>23 Q So that would be an assumption on your part; correct?</p> <p>24 A I'm saying that because I had to apologize to Nurse</p> <p>25 Colleen to get off lockdown. When I deflated my</p>	<p style="text-align: right;">Page 212</p> <p>1 out.</p> <p>2 Q Why did you deflate it and then take it out?</p> <p>3 A Because -- okay. I have a large -- enlarged prostate</p> <p>4 and the whole time I had the catheter in, I was having</p> <p>5 bladder spasms, pain, and a lot of trouble with that</p> <p>6 catheter. And I told them I was in pain, I was having</p> <p>7 bladder spasms. Like, you know, when you urinate it's</p> <p>8 supposed to go directly down the tube. Well, it was</p> <p>9 going all around the tube and just coming out in my</p> <p>10 pants and everything, around the tube. I was just</p> <p>11 having really bad pains and they -- I felt like they</p> <p>12 were ignoring me. But once I deflated the catheter,</p> <p>13 and they took me to the hospital and they put a better</p> <p>14 one in and I didn't have no problems.</p> <p>15 Q How was it that you physically deflated the catheter</p> <p>16 and removed it? Could you explain that?</p> <p>17 A Yes. And that was another thing why she was upset,</p> <p>18 because Nurse Colleen said I had a syringe. "You got</p> <p>19 a syringe in your room. You have a syringe in your</p> <p>20 room. How you deflate the catheter?" And I told her</p> <p>21 -- I said, "I saw the people at the hospital do it</p> <p>22 with a syringe. I just turned it with my hair comb</p> <p>23 and it deflated, the screw on it." And she was, like,</p> <p>24 "You didn't do it. No, you didn't. You got a</p> <p>25 syringe." And I told her that. And when she figured</p>

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<p style="text-align: right;">Page 213</p> <p>1 that out, when they -- you know, she was, like, real</p> <p>2 upset at me. I swear she was.</p> <p>3 Q So you went to the hospital to have it replaced the</p> <p>4 same day that you intentionally deflated it and</p> <p>5 removed it; correct?</p> <p>6 A Yes, the same night. I believe they put in a smaller</p> <p>7 one or whatever one they put in, it was better. But I</p> <p>8 know by me having a prostate -- a large prostate, I</p> <p>9 had to have a smaller catheter, because I was having</p> <p>10 trouble.</p> <p>11 Q Have you -- who has diagnosed you with an enlarged</p> <p>12 prostate?</p> <p>13 A During the surgery, the people at the hospital. I had</p> <p>14 trouble with the catheter from the beginning.</p> <p>15 Q Is that in your medical record somewhere that you were</p> <p>16 diagnosed with an enlarged prostate?</p> <p>17 A It has to be because it's the truth.</p> <p>18 Q And if it's not there, you would --</p> <p>19 A Find it. If it's not there, it's somewhere, because</p> <p>20 it's the truth. And one thing about the truth, it</p> <p>21 don't need no support.</p> <p>22 Q Well, you need evidence for a lawsuit.</p> <p>23 A I can find it. That's not a thing, sir. That was a</p> <p>24 problem that I had and they had to give me a smaller</p> <p>25 catheter. That's not a problem. So it won't be a</p>	<p style="text-align: right;">Page 215</p> <p>1 A I would say that just because they have the records</p> <p>2 doesn't mean it was given to me.</p> <p>3 Q Okay. That's not quite what my question was. It was</p> <p>4 just --</p> <p>5 A I can't recall.</p> <p>6 Q You can't recall? That wasn't my question. My</p> <p>7 question was, I want you to assume that the medical</p> <p>8 record documents, page 191 -- that you were given</p> <p>9 discharge instructions for a diagnosis of</p> <p>10 diverticulitis. Are you telling me that you disagree</p> <p>11 that you were informed back in December of 2014 that</p> <p>12 you had diverticulitis?</p> <p>13 A Yes, I do. I never remember someone telling me that I</p> <p>14 had diverticulitis. I remember them telling me I had</p> <p>15 irritable bowel syndrome. I remember them also --</p> <p>16 took tests from me and told me that they were waiting</p> <p>17 on results. So them finding out I had diverticulitis,</p> <p>18 I wasn't aware of it. Maybe it came back on the</p> <p>19 results and I never returned back to the hospital to</p> <p>20 get the -- you know what I mean?</p> <p>21 Q Well, according to those -- the records from McLaren</p> <p>22 Port Huron, you were a regular visitor there around</p> <p>23 that time, usually for your complaints of the STIs and</p> <p>24 abdominal pain.</p> <p>25 A Abdominal pain? What you mean? I showed up for</p>
<p style="text-align: right;">Page 214</p> <p>1 problem to find it.</p> <p>2 Q When you say the surgery at the hospital, are you</p> <p>3 talking about --</p> <p>4 A The original, initial.</p> <p>5 Q With Dr. Kansakar?</p> <p>6 A Yes.</p> <p>7 Q In December?</p> <p>8 A Yes.</p> <p>9 Q When were you first diagnosed with diverticulitis?</p> <p>10 A Right before the surgery in December 2019. I mean,</p> <p>11 December 2016.</p> <p>12 Q So if we were to look at the McLaren Port Huron</p> <p>13 medical records from December 2014, it's on page 119</p> <p>14 of those the documents, that you were given discharge</p> <p>15 instructions for a diagnosis of diverticulitis, would</p> <p>16 you disagree with that?</p> <p>17 A Discharge from diverticulitis. I was given discharge</p> <p>18 -- thought this guy -- yeah, he just said I had</p> <p>19 colitis, now you say I have diverticulitis. You know,</p> <p>20 I disagree because those people told me I had -- they</p> <p>21 did some tests -- I never got the results -- but they</p> <p>22 told me I had irritable bowel syndrome.</p> <p>23 Q I'm just asking you, if the medical record documents</p> <p>24 that you were given instructions for a diagnosis of</p> <p>25 diverticulitis, would you disagree with that?</p>	<p style="text-align: right;">Page 216</p> <p>1 abdominal pain, like, once or twice.</p> <p>2 Q According to the records you went to McLaren Port</p> <p>3 Huron in August 27, 2014 --</p> <p>4 A 2014.</p> <p>5 Q -- with complaints of urogenital issues, dysuria and</p> <p>6 particulate matter in urine. Do you remember that?</p> <p>7 A Yes, but that's not abdominal pain.</p> <p>8 Q My point is you were a regular visitor to McLaren Port</p> <p>9 Huron in 2014. Do you remember that?</p> <p>10 A Yes, and like I told your guy, when I went, that's</p> <p>11 what I went for. Like, if I went for a sexually</p> <p>12 transmitted infection, that's what I dealt with. But</p> <p>13 as far as abdominal pains, I only went to the hospital</p> <p>14 one time for that.</p> <p>15 Q According to medical records you went to McLaren Port</p> <p>16 Huron December 3, 2014 with complaints of fever and</p> <p>17 abdominal pain. You were given a CT exam. Do you</p> <p>18 remember that?</p> <p>19 A Uh-huh. That's what I'm talking about.</p> <p>20 Q Right. And you returned on December 10, 2014 in the</p> <p>21 emergency department with complaints of abdominal</p> <p>22 pain --</p> <p>23 A The only two times ever.</p> <p>24 Q -- with a diagnosis of diverticulitis. Do you</p> <p>25 remember that?</p>



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<p style="text-align: right;">Page 217</p> <p>1 A Yes. See, that's what I'm talking about. That was</p> <p>2 the last time I went and I wasn't there when they made</p> <p>3 the diagnosis. The first time I went and I was having</p> <p>4 stomach problems and everything like that, that's when</p> <p>5 they told me I had irritable bowel syndrome. The</p> <p>6 second time I went, that's when they gave me the CAT</p> <p>7 scans and took the test but they hadn't gave me a</p> <p>8 diagnosis in hand. They must have sent it to wherever</p> <p>9 and told me I had to come back, but I wasn't aware of</p> <p>10 the diverticulitis.</p> <p>11 Q Well, according to the records you did come back a</p> <p>12 week later on December 17, 2014 to McLaren Port Huron</p> <p>13 when you came to the ED with complaints of abdominal</p> <p>14 pain. They did an X-ray, referred to your prior CT</p> <p>15 scan and documented that you did not take your</p> <p>16 antibiotics that were prescribed. Do you remember</p> <p>17 that?</p> <p>18 A That was the second time. It's only two visits that I</p> <p>19 went for abdominal pain; right?</p> <p>20 Q No.</p> <p>21 A How many?</p> <p>22 Q That's the third -- at least the third one just in</p> <p>23 December at McLaren Port Huron.</p> <p>24 A The third one in December?</p> <p>25 Q Yeah.</p>	<p style="text-align: right;">Page 219</p> <p>1 was wrong with me. You know what I'm saying? It's in</p> <p>2 my medical records. If I ever had diverticulitis,</p> <p>3 they would have knew that automatically. Like, he's</p> <p>4 got diverticulitis. He might be suffering from</p> <p>5 cramping. He might have a fistula.</p> <p>6 Q Did you ever follow up with anybody, another doctor,</p> <p>7 for your colitis or your irritable bowel syndrome?</p> <p>8 A Follow up with another doc -- I just returned to the</p> <p>9 hospital. That was my follow-up.</p> <p>10 Q Is that what your plan always was, just to go back to</p> <p>11 the emergency department?</p> <p>12 A I didn't have any insurance, so that's what I had to</p> <p>13 do at the time.</p> <p>14 Q Who paid for your reversal surgery with Dr. Webber?</p> <p>15 A My insurance, I believe.</p> <p>16 Q What insurance did you have?</p> <p>17 A Medicaid. Medicare. Medicare.</p> <p>18 Q Is it Medicaid? You're not old enough for Medicare,</p> <p>19 are you?</p> <p>20 A No. Medicaid.</p> <p>21 Because do you know -- the reason why I</p> <p>22 asked you that question like that is because right</p> <p>23 before I had my reversal surgery I -- they had to take</p> <p>24 tests for hours to see exactly what was wrong with me</p> <p>25 because they told me if I -- if I didn't have</p>
<p style="text-align: right;">Page 218</p> <p>1 A What was the first one?</p> <p>2 Q December 3.</p> <p>3 A Uh-huh.</p> <p>4 Q December 10 and December 17.</p> <p>5 A Uh-huh. Yeah. That's when I told you I went and had</p> <p>6 the test done. And the third time when I went and</p> <p>7 they diagnosed me with diverticulitis or whatever,</p> <p>8 that's what I say, I wasn't aware of that. I didn't</p> <p>9 get the results.</p> <p>10 Q So your version is that you didn't get the results,</p> <p>11 even though the medical records say that you were</p> <p>12 given the results; correct?</p> <p>13 A My version is I -- they, to me, my understanding was</p> <p>14 they did not know what it was. I had been diagnosed</p> <p>15 with a few things. I had been diagnosed with</p> <p>16 irritable bowel syndrome. I had been diagnosed -- you</p> <p>17 know what I mean? They did not know what it was. The</p> <p>18 last time I had went that's when they gave me the</p> <p>19 test, the CAT scan and scraped something on the card</p> <p>20 and everything like that. I left. I left the</p> <p>21 hospital after they did the test. I didn't sit there</p> <p>22 and wait on results and they didn't tell me the</p> <p>23 results. They must have figured that out on their</p> <p>24 own. But I know, because when I went to the jail and</p> <p>25 I was having all those problems, they didn't know what</p>	<p style="text-align: right;">Page 220</p> <p>1 diverticulitis, if I had something else, then they --</p> <p>2 Crohn's. They tested me for Crohn's disease. See,</p> <p>3 she wasn't sure. My surgeon wasn't sure if I had</p> <p>4 Crohn's disease or diverticulitis. If I knew I had</p> <p>5 diverticulitis, I would have told her, like, "I've got</p> <p>6 diverticulitis." You know what I'm saying? Because</p> <p>7 if I had Crohn's disease I don't think they would have</p> <p>8 done the bag or something like that. You know? She</p> <p>9 told me she had to figure out whether I had Crohn's or</p> <p>10 diverticulitis. And she went under tests to figure it</p> <p>11 out. They found the diverticulitis right before my</p> <p>12 reversal. Dr. Kansakar. Because they tested me for</p> <p>13 Crohn's.</p> <p>14 Q So your discharge instructions from December 2014 from</p> <p>15 McLaren Port Huron say that you had diverticulitis but</p> <p>16 you say no one told you; right?</p> <p>17 A That I can recall, that I remember. But I know for</p> <p>18 sure right before my surgery to when I had the</p> <p>19 colostomy, to get the bag, Dr. Kansakar had to do some</p> <p>20 tests before I even signed to do the surgery because</p> <p>21 she had to make sure it was Crohn's or diverticulitis.</p> <p>22 She had to find out what it was. So if they had</p> <p>23 diagnosed me with diverticulitis, she would have</p> <p>24 automatically knew. Like, "You have diverticulitis.</p> <p>25 They diagnosed you with it." But she did tests to</p>

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<p style="text-align: right;">Page 221</p> <p>1 find out if it was Crohn's or diverticulitis and found</p> <p>2 out it was diverticulitis and I didn't have Crohn's.</p> <p>3 And that should be on record because I had to wait for</p> <p>4 the test to find what I had. So if I already knew</p> <p>5 what I had, I wouldn't have had to do a test.</p> <p>6 Q Sir, you need to focus on the question. You keep</p> <p>7 expanding on it. You're being nonresponsive.</p> <p>8 A I know it. Especially if -- if I don't say the answer</p> <p>9 you want me to say, I'm being nonresponsive.</p> <p>10 Q Have you ever been officially diagnosed with a hernia?</p> <p>11 A Not officially.</p> <p>12 Q Is Dr. Webber the only doctor who has ever mentioned</p> <p>13 the possibility of a hernia?</p> <p>14 A Dr. Webber is the only and the latest doctor to have</p> <p>15 seen my stomach.</p> <p>16 Q Did Dr. Kansakar ever mention that you had a hernia</p> <p>17 postoperatively or at any point?</p> <p>18 A I haven't seen Dr. Kansakar since I was wearing a bag.</p> <p>19 Q Focus on my question. Did Dr. Kansakar ever say</p> <p>20 either in the hospital or the two postoperative visits</p> <p>21 that you had with her that she was concerned about a</p> <p>22 potential hernia?</p> <p>23 A No, she didn't. Her whole thing was the reversal</p> <p>24 plan. She was focused on the fact they wouldn't</p> <p>25 contact me about --</p>	<p style="text-align: right;">Page 223</p> <p>1 if it is a hernia is not the same thing as actually</p> <p>2 having surgery for a hernia, is it?</p> <p>3 A Listen, I feel like when I go follow up and they say</p> <p>4 it's a hernia, I'm going to have to get the surgery.</p> <p>5 So I've been dragging my feet.</p> <p>6 Q Where exactly is the hernia or the potential hernia?</p> <p>7 A On the right side of my stomach. You want to see it?</p> <p>8 I can show you.</p> <p>9 Q Sure, but that's on the opposite of where your stoma</p> <p>10 was; correct?</p> <p>11 A Yes. Let me show you why. You see the lump? See how</p> <p>12 that's a lump?</p> <p>13 Q Kind of looks like the other side.</p> <p>14 A Yeah, but you can see that this is a lump. It's a</p> <p>15 lump right there. Right here (indicating). It's a</p> <p>16 lump, a knot, and it's hard. There's not a knot or a</p> <p>17 lump on this side. It's nothing hard. It's hard</p> <p>18 right here. It's a knot and a lump.</p> <p>19 Q It's my understanding that you were going to maybe get</p> <p>20 some pictures taken of your abdomen at the deposition</p> <p>21 when it's done?</p> <p>22 A Yeah. No problem.</p> <p>23 Q So just for the record can we do both sides and maybe</p> <p>24 you can point, and when you point at the right side</p> <p>25 you can point to where your hernia is, if that's okay,</p>
<p style="text-align: right;">Page 222</p> <p>1 Q Sir, focus on the question. I mean --</p> <p>2 A I'm answering the best I can, sir.</p> <p>3 Q Well, we're getting on in time here and part of the</p> <p>4 reason is you keep on adding on. You're not focusing</p> <p>5 on the question.</p> <p>6 A Okay. I'll let you tell it.</p> <p>7 Q So at any point did Dr. Kansakar ever mention she was</p> <p>8 concerned about a hernia in the multiple times that</p> <p>9 she saw you?</p> <p>10 A That was -- no. Dr. Kansakar, that wasn't her concern</p> <p>11 about a hernia. She was reversal care. That's the</p> <p>12 only thing I ever talked to her about, was reversal</p> <p>13 care after the surgery.</p> <p>14 Q Did Dr. Webber say what kind of a hernia he thought it</p> <p>15 might be?</p> <p>16 A If he did, I can't remember. I couldn't tell you</p> <p>17 specifically.</p> <p>18 Q Did Dr. Webber ever schedule a return appointment for</p> <p>19 you so you could follow up for a potential hernia?</p> <p>20 A Yes, he did.</p> <p>21 Q When is that? Have you gone to that appointment?</p> <p>22 A No, I did not because I had two major surgeries and</p> <p>23 I'm not ready to have a third one. So I'm dragging my</p> <p>24 feet on that.</p> <p>25 Q Okay. But going and following up with a doctor to see</p>	<p style="text-align: right;">Page 224</p> <p>1 in the picture.</p> <p>2 A No problem.</p> <p>3 Q Or your potential hernia I should say.</p> <p>4 A Alleged. Alleged.</p> <p>5 Q Alleged hernia.</p> <p>6 Now, can you give me a second? I just</p> <p>7 need to go through my notes. I'm going to go off for</p> <p>8 a few minutes. Is that all right?</p> <p>9 A Yeah, no problem. Take your time.</p> <p>10 VIDEOGRAPHER: We are going off the</p> <p>11 record. It's 5:35 p.m.</p> <p>12 (Whereupon, a recess was held.)</p> <p>13 - - -</p> <p>14 VIDEOGRAPHER: We are back on record. It</p> <p>15 is 5:41 p.m.</p> <p>16 MR. WILLIS: I have no further questions</p> <p>17 at this time.</p> <p>18 MR. SCARBER: I've got a couple -- just a</p> <p>19 couple follow-up questions for you, Mr. Jackson.</p> <p>20 - - -</p> <p>21 RE-EXAMINATION</p> <p>22 BY MR. SCARBER:</p> <p>23 Q Do you recall when you saw nurse practitioner Drinkert</p> <p>24 when you first came to the MDOC back on March 24, 2017</p> <p>25 that you were concerned about not having your</p>

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<p style="text-align: right;">Page 225</p> <p>1 colostomy reversal prior to getting to the MDOC? Do</p> <p>2 you remember that?</p> <p>3 A No.</p> <p>4 Q We talked about the fact that when you came into the</p> <p>5 MDOC in March of 2017 you were already upset because</p> <p>6 you hadn't got your colostomy done prior to coming to</p> <p>7 the MDOC. You remember we talked about that for a</p> <p>8 little bit?</p> <p>9 A You mentioned that and I said I wasn't upset. I said</p> <p>10 I was hurt.</p> <p>11 Q You were hurt?</p> <p>12 A Yeah.</p> <p>13 Q Okay. I'm sorry. Wrong choice of words from me.</p> <p>14 A Thank you.</p> <p>15 Q Nurse practitioner Drinkert has a note in his records</p> <p>16 where he says that, quote, you were fixated on a</p> <p>17 perceived injustice of not having your colostomy</p> <p>18 reversed. You were reporting youthfulness and you</p> <p>19 were reporting that you needed to have the colostomy</p> <p>20 reversed. Do you remember coming into the jail having</p> <p>21 that kind of discussion with them where you were</p> <p>22 telling them about how you were young, you didn't want</p> <p>23 to have this for the rest of your life, and you needed</p> <p>24 to have this reversed?</p> <p>25 A I don't remember.</p>	<p style="text-align: right;">Page 227</p> <p>1 Q So you agree that this record says that; correct?</p> <p>2 A Yeah, I agree that says that.</p> <p>3 Q It also indicates in this record, quote, able to</p> <p>4 complete self-care, has greater degree of body image</p> <p>5 issues than other concerns.</p> <p>6 A See, that's my problem. Like, I never said that.</p> <p>7 That's why I feel like I'm not agreeing with that</p> <p>8 because I've never said that. It's a lot of stuff you</p> <p>9 all just be saying. I never said anything about body</p> <p>10 issues, and that's what I'm trying to figure out,</p> <p>11 where are you all getting that from?</p> <p>12 Q You agree that the record says this. You don't think</p> <p>13 you said this, though; right?</p> <p>14 A Let me see. You say that the record --</p> <p>15 Q The record says that you would agree with me. I just</p> <p>16 quoted to you what the record says; correct?</p> <p>17 A You see something about body issues on here?</p> <p>18 Q Right here (indicating), this last quote. I just read</p> <p>19 that.</p> <p>20 A Has a great degree of body issues. Yes, it says that</p> <p>21 on the paper.</p> <p>22 Q And you also testified earlier that they had offered</p> <p>23 you some counseling and coping stuff. You say it was</p> <p>24 similar to what they had offered to other prisoners</p> <p>25 but you said you didn't need that, though; right?</p>
<p style="text-align: right;">Page 226</p> <p>1 Q It could have happened. You just don't remember it?</p> <p>2 A I don't remember. I can't say it could have happened.</p> <p>3 I'm just saying I don't remember. I mean, you know,</p> <p>4 if you got it written in paper or whatever like that,</p> <p>5 then maybe it did happen. But I'm saying I don't</p> <p>6 remember it.</p> <p>7 Q Let me show you my note here, and this is on page 89</p> <p>8 of the MDOC records. Can you read what I have</p> <p>9 highlighted there? Just read what I highlighted, if</p> <p>10 you can.</p> <p>11 A Okay. I see what it says here.</p> <p>12 Q Okay. So according to the record, the record states,</p> <p>13 quote, fixated on perceived injustice of not having</p> <p>14 colostomy reversed, reporting youthfulness and</p> <p>15 repeating the need to have colostomy reversed, end</p> <p>16 quote.</p> <p>17 A End quote.</p> <p>18 Q You need to see it again?</p> <p>19 A Yeah.</p> <p>20 Q Okay.</p> <p>21 A Fixated. You see a quote? Where do you see a quote?</p> <p>22 Isn't a quote, like, a parentheses?</p> <p>23 Q I was quoting it for the record, so that's --</p> <p>24 A Oh, I thought you said that's what it says. Excuse</p> <p>25 me.</p>	<p style="text-align: right;">Page 228</p> <p>1 A No, I didn't say that they offered me anything</p> <p>2 different than they offered other prisoners. I said</p> <p>3 as standard, when you go to prison, they ask anybody</p> <p>4 if they want someone to talk to -- anyone -- people</p> <p>5 without medical issues or a colostomy bag, perfectly</p> <p>6 healthy people. If you want to talk to somebody, they</p> <p>7 offer that to all prisoners. They didn't offer me</p> <p>8 nothing different than they offer any other prisoner,</p> <p>9 someone to talk to. I didn't choose to talk to no one</p> <p>10 because I didn't want to be on meds.</p> <p>11 Q I want to refer you to page 72 of the medical records</p> <p>12 from the Michigan Department of Corrections. And can</p> <p>13 you just read what I highlighted here?</p> <p>14 A Uh-huh.</p> <p>15 Q Read it to yourself and I'll ask you a question about</p> <p>16 it. Your counsel can look at it.</p> <p>17 A Okay.</p> <p>18 Q Let me see it back for a second.</p> <p>19 A Okay.</p> <p>20 Q And what I just showed you was -- it is a mental</p> <p>21 health services referral from Nurse Practitioner</p> <p>22 Ronald Drinkert, and what it states here is, quote, I</p> <p>23 am only 35 years old and I cannot have this my whole</p> <p>24 life, end quote. And it indicates that you were</p> <p>25 referring to the colostomy here. Do you recall having</p>

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<p style="text-align: right;">Page 229</p> <p>1 that conversation with NP Drinkert?</p> <p>2 A I don't recall, but I do recall saying that I don't</p> <p>3 want this bag for the rest of my life. I said that</p> <p>4 many of times. So that's fair to say that I said</p> <p>5 that.</p> <p>6 Q Okay. And ultimately we discussed that you didn't</p> <p>7 have it for the rest of your life. You got rid of the</p> <p>8 bag now; right? Correct?</p> <p>9 A Yes.</p> <p>10 Q It also says here at the bottom, Desired Action,</p> <p>11 quote, evaluate for current level of coping ability</p> <p>12 and possible need for supportive mental health care</p> <p>13 regarding the body image and other possible issues,</p> <p>14 end quote. Do you -- did I read that correctly from</p> <p>15 that medical record?</p> <p>16 A Yes, sir, you read it correctly.</p> <p>17 Q And you said that you chose not to really deal with</p> <p>18 the mental health care because you didn't want</p> <p>19 medications and things like that; right?</p> <p>20 A Yeah, to be on medication.</p> <p>21 Q Okay. It's my understanding, Mr. Jackson, that the</p> <p>22 damages you're seeking in this case are primarily</p> <p>23 based upon what? What are the damages you're seeking</p> <p>24 in this case?</p> <p>25 A Mental and physical pain and suffering.</p>	<p style="text-align: right;">Page 231</p> <p>1 Q Because physically, when you got out of jail, the job</p> <p>2 you were able to do -- you were still able to do work</p> <p>3 and do all of this hands-on work that you like to</p> <p>4 do -- landscaping, snow removal, and work with your</p> <p>5 hands; correct?</p> <p>6 A Yes, sir. Yes, sir. I was able to do -- yep, I was</p> <p>7 able to do it to a certain extent.</p> <p>8 Q And as far as you are aware you never sought any</p> <p>9 further request for a colostomy reversal where you</p> <p>10 kind of went up some kind of ladder and had it</p> <p>11 reviewed by someone other than Dr. Papendick's review,</p> <p>12 which is where we went over the note from 2017 where</p> <p>13 it indicated it wasn't medically necessary. Is that</p> <p>14 true?</p> <p>15 A Rephrase your question.</p> <p>16 Q Your denial for this particular colostomy reversal</p> <p>17 occurs in 2017. Would you agree with that?</p> <p>18 A My denial occurs in 2017? I'm not sure. You have to</p> <p>19 show me. I can't answer the question unless I see it.</p> <p>20 Like, I have to see.</p> <p>21 Q So the document you have in front of you right</p> <p>22 there --</p> <p>23 A Yes.</p> <p>24 Q -- at the bottom, that's signed by Subrina Aiken,</p> <p>25 RN --</p>
<p style="text-align: right;">Page 230</p> <p>1 Q You have not indicated that you have made any claim</p> <p>2 for physical pain and suffering in this case. Are you</p> <p>3 aware of that?</p> <p>4 A Yeah because it's all -- mental, I had to go through</p> <p>5 mental. Yeah.</p> <p>6 Q Okay.</p> <p>7 A Like, me having a bag didn't disable me, but it -- I</p> <p>8 was uncomfortable with it. Yes.</p> <p>9 Q Okay.</p> <p>10 A Very.</p> <p>11 Q So the damages you're seeking are for mental anguish,</p> <p>12 embarrassment; correct?</p> <p>13 A I don't know why you're talking about embarrassment.</p> <p>14 I didn't say that.</p> <p>15 Q Are you seeking damages in this case because you were</p> <p>16 embarrassed because you had to have the bag?</p> <p>17 A No. That's not -- nothing about embarrassed. What do</p> <p>18 you mean? I'm angry because I had to have the bag and</p> <p>19 it could have been reversed. I had to go through all</p> <p>20 of that stuff.</p> <p>21 Q You're not making any claims in this case for lost</p> <p>22 wages --</p> <p>23 A No.</p> <p>24 Q -- or potential future earnings or anything like that?</p> <p>25 A No.</p>	<p style="text-align: right;">Page 232</p> <p>1 A Yes.</p> <p>2 Q -- she says, "Subrina Aiken, RN, Clinical</p> <p>3 Administrative Assistant, Jackson Healthcare</p> <p>4 Administration." She has a signature here. This</p> <p>5 particular response to your agreement is dated June 8,</p> <p>6 2017 at the bottom; correct?</p> <p>7 A Yes, sir.</p> <p>8 Q That is, again, page ID 26 of the court's electronic</p> <p>9 filing.</p> <p>10 Did you appeal her decision?</p> <p>11 A I can't remember, sir. Can I refer to the notes?</p> <p>12 This was, like, years ago. I don't want to speak on</p> <p>13 nothing.</p> <p>14 Q I just want to know --</p> <p>15 A I did a lot of paperwork and stuff.</p> <p>16 Q There is also a page 2 to that -- or a page 3, if you</p> <p>17 will. If you turn over the page. This looks like</p> <p>18 it's a Step 3 grievance response. Okay? And this</p> <p>19 indicates here that your grievance is being denied to</p> <p>20 reverse your colostomy, and it's dated 10 -- October</p> <p>21 19, 2017.</p> <p>22 A Uh-huh.</p> <p>23 Q Do you see that?</p> <p>24 A Yes, sir.</p> <p>25 Q Are you aware of receiving any further grievance</p>



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<p style="text-align: right;">Page 233</p> <p>1 denials after October of 2017 with respect to the</p> <p>2 Michigan Department of Corrections?</p> <p>3 A I can't remember. It was a long time ago.</p> <p>4 Q Did you ever pursue, as far as you know, any denials</p> <p>5 of this -- any formal denials of your request for a</p> <p>6 colostomy reversal after October 2017?</p> <p>7 A It's been a long time, so I can't remember.</p> <p>8 Q According to your records you did not. If our records</p> <p>9 show that you did not, would you disagree with that,</p> <p>10 since you really don't have a memory?</p> <p>11 A I didn't pursue -- so the question was, did I pursue</p> <p>12 any other grievances after I was denied in 2017?</p> <p>13 Q Yes. Well, I asked that question and you said you</p> <p>14 can't remember.</p> <p>15 A And you said if your records show that I haven't,</p> <p>16 would I agree? I still -- I can't say. They can be</p> <p>17 somewhere and you all didn't get them.</p> <p>18 Q But you're not sitting here saying that you actually</p> <p>19 did; right?</p> <p>20 A I'm not saying that I actually did, right. That I</p> <p>21 actually didn't.</p> <p>22 Q You're not saying --</p> <p>23 A I did or I didn't.</p> <p>24 Q -- whether you did or you didn't.</p> <p>25 A Yes. Because I can't remember.</p>	<p style="text-align: right;">Page 235</p> <p>1 Q So are you telling us that you're just as certain that</p> <p>2 there was another aspect to your grievance or appeal?</p> <p>3 A No, I'm not. You couldn't say that either.</p> <p>4 Q Listen: I'm going to tell you when we walk out of</p> <p>5 here today, whatever your answers that you give, those</p> <p>6 are going to be your answers. So I'm giving you every</p> <p>7 opportunity to say if you feel like you did it or if</p> <p>8 you didn't do it. I'm trying to give you every</p> <p>9 opportunity to say --</p> <p>10 A No big deal. I'm saying what I want to say. Thank</p> <p>11 you.</p> <p>12 Q So you can't tell us today whether or not you --</p> <p>13 A You --</p> <p>14 COURT REPORTER: I'm sorry. Sir, you've</p> <p>15 got to let him get his full question out. I can't</p> <p>16 write both of you at the same time.</p> <p>17 BY MR. SCARBER:</p> <p>18 Q So, Mr. Jackson, you're not able to tell us today</p> <p>19 whether you pursued any further grievance or not?</p> <p>20 A I'm telling you that was years ago and I don't recall</p> <p>21 whether I did or didn't. I would be wrong by saying I</p> <p>22 did or didn't and don't remember.</p> <p>23 Q Okay. That's fine. And I appreciate that. But you</p> <p>24 said something after in your last answer that said,</p> <p>25 "I'm just as certain about this as" --</p>
<p style="text-align: right;">Page 234</p> <p>1 Q So if the records that I have shows that the last step</p> <p>2 to the grievance --</p> <p>3 A That's not necessarily true because it could be</p> <p>4 somewhere just like the other record that you all</p> <p>5 don't have, so...</p> <p>6 Q What record don't we have?</p> <p>7 A Remember we were talking about -- what was we talking</p> <p>8 about here? It was like a surgery or something that I</p> <p>9 knew that we had but you all didn't -- oh, that's what</p> <p>10 it was. It was Dr. Webber's -- him telling me that I</p> <p>11 -- me following up and him saying that I potentially</p> <p>12 have a hernia. You all don't have no records of that,</p> <p>13 but I know for sure that happened. I went to it. So</p> <p>14 just because you all don't have a record of it doesn't</p> <p>15 mean that it's not true, so I'm saying with this I</p> <p>16 don't know.</p> <p>17 Q Well, with that you were pretty certain that something</p> <p>18 occurred.</p> <p>19 A Okay.</p> <p>20 Q With this one you're not quite certain whether it --</p> <p>21 A I wouldn't say -- I'm no more certain than the other</p> <p>22 one. I'm about the same. It's even, 50/50.</p> <p>23 Q But you were really certain about your -- that you had</p> <p>24 another visit with Dr. Webber. You told us about --</p> <p>25 A I'm about the same level.</p>	<p style="text-align: right;">Page 236</p> <p>1 A No. That's what you said.</p> <p>2 Q No, I didn't say that. You did. But it's okay. The</p> <p>3 record will speak for itself.</p> <p>4 A Thank you.</p> <p>5 Q The denial of -- the determination of a lack of</p> <p>6 medical necessity not being demonstrated at this time</p> <p>7 by Dr. Papendick that was from an April 19, 2017 time</p> <p>8 frame, are you telling us today that there was another</p> <p>9 request subsequent to this denial with respect to Dr.</p> <p>10 Papendick or any review of -- any kind of utilization</p> <p>11 review of your need or necessity for a colostomy</p> <p>12 reversal?</p> <p>13 A You have to rephrase that one.</p> <p>14 Q Okay. I will rephrase it. You're probably right.</p> <p>15 This denial or this determination by Dr.</p> <p>16 Papendick, that there was no medical necessity</p> <p>17 demonstrated at this time, is dated April 19, 2017.</p> <p>18 A Uh-huh.</p> <p>19 Q My question to you is, are you aware of any other</p> <p>20 requests that were made to review Dr. Papendick's</p> <p>21 determination after April 19, 2017?</p> <p>22 A I don't recall, sir. It's a long time.</p> <p>23 Q What your counsel had put in front of you earlier</p> <p>24 today are your Answers to Interrogatories and Request</p> <p>25 to Produce in this matter. Can you take a quick look</p>

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<p style="text-align: right;">Page 237</p> <p>1 at those? I'm not going to spend a lot of time on</p> <p>2 these.</p> <p>3 Okay. At the end of this particular</p> <p>4 document is -- it's an electronic signature --</p> <p>5 A Okay.</p> <p>6 Q -- on page 19. What my question is going to be to you</p> <p>7 is, do you recall Mr. Cross and Mr. Margolis actually</p> <p>8 speaking with you and asking you these questions about</p> <p>9 your lawsuit and trying to get information from you</p> <p>10 and them drafting this particular document for you,</p> <p>11 you reviewing it and then you signing it?</p> <p>12 A Do I remember this document? No.</p> <p>13 Q Let me ask the question this way. At some point</p> <p>14 during the course of this lawsuit did Mr. Cross or</p> <p>15 Mr. Margolis speak with you about answering certain</p> <p>16 questions pertaining to this lawsuit?</p> <p>17 A They said just be truthful. That's the only thing</p> <p>18 they ever said to me about anything to do with</p> <p>19 answering questions.</p> <p>20 Q My question is not really about that. I'm -- my</p> <p>21 question is really getting at -- this document here</p> <p>22 that I just gave you is a document that your attorneys</p> <p>23 are representing that they went over with you and you</p> <p>24 would have agreed to the answers that are in there.</p> <p>25 A Yeah. What about it?</p>	<p style="text-align: right;">Page 239</p> <p>1 A He's a friend. I know his whole family. His whole,</p> <p>2 entire family.</p> <p>3 Q When did you meet him, though? Under what</p> <p>4 circumstances? Were you guys childhood friends? Did</p> <p>5 you used to play together outside? Did you work with</p> <p>6 him? That's what I'm getting at.</p> <p>7 A Yeah, I worked with him.</p> <p>8 Q How did you originally meet him?</p> <p>9 A He was doing work on a house in my neighborhood and I</p> <p>10 worked with him. I was a kid. He taught me how to --</p> <p>11 it started out he taught me how to clean bricks for,</p> <p>12 like -- okay. You know how somebody take all the</p> <p>13 bricks off the house and you got to chisel them so</p> <p>14 they be flat bricks and you reuse them? That's the</p> <p>15 first thing I ever did when I met Mike. That's what</p> <p>16 he was doing. I was a kid.</p> <p>17 Q Do you live with Mike now?</p> <p>18 A No.</p> <p>19 Q Who do you actually live with now?</p> <p>20 A Fatima Jackson.</p> <p>21 Q Do you pay rent there?</p> <p>22 A Yes.</p> <p>23 Q How much rent do you pay?</p> <p>24 A Just two hundred dollars a month.</p> <p>25 Q And how are you able to pay it?</p>
<p style="text-align: right;">Page 238</p> <p>1 Q And it's not physically signed by you but it's an</p> <p>2 electronic signature by you.</p> <p>3 A Oh, yeah, yeah, yeah.</p> <p>4 Q So what I went to know is -- just quickly look over</p> <p>5 that and let us know that, yes, this is the document I</p> <p>6 went over with my attorneys.</p> <p>7 A Yes, he went over this with me. He always but, you</p> <p>8 know, I just couldn't remember. That's all. If it's</p> <p>9 my electronic signature, I definitely signed that.</p> <p>10 Q Yep. And I'm not trying to make a trick question here</p> <p>11 or anything like. I just want to -- we don't have</p> <p>12 your physical signature.</p> <p>13 A Oh, no, you doing fine, man. I really enjoyed you</p> <p>14 today.</p> <p>15 Q Well, I appreciate that.</p> <p>16 We don't have a physical signature, so I</p> <p>17 was just trying to make sure that these are in effect</p> <p>18 your answers.</p> <p>19 A Yeah.</p> <p>20 Q You would agree with that?</p> <p>21 A Yes, sir. Stand by that a hundred percent.</p> <p>22 Q How long have you known Michael Washington?</p> <p>23 A Michael Washington? Maybe 20 years. Little more than</p> <p>24 20 years.</p> <p>25 Q And in what capacity did you meet Mr. Washington?</p>	<p style="text-align: right;">Page 240</p> <p>1 A Money I saved from odd jobs that I do.</p> <p>2 Q You mentioned also that odd jobs and --</p> <p>3 A Like, as far as landscaping. You know?</p> <p>4 Q But you mentioned earlier, Mr. Jackson, I think, that</p> <p>5 the odd jobs you do and a stimulus is the source of</p> <p>6 your income.</p> <p>7 A Yeah. That was my stimulus check. Everybody got</p> <p>8 that.</p> <p>9 Q And you received yours already?</p> <p>10 A Not this one, but I received the 600 one. I'm waiting</p> <p>11 on one. It should be here any day, the 14. I</p> <p>12 received the 12, six. I'm waiting on the 14. Should</p> <p>13 be here any day.</p> <p>14 Q How did you get to your deposition today?</p> <p>15 A I got a ride.</p> <p>16 Q Who gave you a ride?</p> <p>17 A My attorney.</p> <p>18 Q And where are you coming from today?</p> <p>19 A Home. My girlfriend's house.</p> <p>20 Q I thought you live with your sister.</p> <p>21 A I was at my girlfriend's house today.</p> <p>22 Q Who is your girlfriend?</p> <p>23 A Well, it's -- her name is Rachel.</p> <p>24 Q Can you spell her full name for us?</p> <p>25 A Rachel, R-A-C-H-E-L. Fuller, F-U-L-L-E-R.</p>

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<p>1 Q And where does she live?</p> <p>2 A Where I was coming from, in Highland Park.</p> <p>3 Q Do you know an address?</p> <p>4 A No.</p> <p>5 Q What street?</p> <p>6 A What was it? Midland? Yeah.</p> <p>7 Q What are the cross-streets, if you know?</p> <p>8 A Woodward.</p> <p>9 Q How long have you -- so do you spend some time there</p> <p>10 and some time at your sister's, then?</p> <p>11 A I'm at my sister's mostly but, yeah, I be there.</p> <p>12 Q And you stay there for at least overnight or maybe a</p> <p>13 couple nights sometimes?</p> <p>14 A I spend a couple nights here and there.</p> <p>15 Q Have you seen your son at all since you got out of</p> <p>16 jail?</p> <p>17 A I don't have any rights of my son to see him.</p> <p>18 Q Okay. So I didn't understand that. So if you don't</p> <p>19 have any rights, you can't see him at all?</p> <p>20 A No. Can't.</p> <p>21 Q And that's something you're working on?</p> <p>22 A Yes, sir. I'm working on getting my life together and</p> <p>23 getting my rights, since I've been out of prison.</p> <p>24 Q Do you recall the names of any corrections officers</p> <p>25 while you were at the Department of Corrections that</p>	<p>1 through with my bags and supplies. I talked to him</p> <p>2 about that. Yep, Mr. Richardson. Mr. Richardson, he</p> <p>3 was at St. Louis.</p> <p>4 Q St. Louis, Mr. Richardson; Mrs. Wilson, St. Louis; and</p> <p>5 Mr. Willis was where?</p> <p>6 A Yeah, St. Louis.</p> <p>7 Q St. Louis?</p> <p>8 A No, Mr. Willis was Jackson.</p> <p>9 Q Jackson.</p> <p>10 A He was the counselor. Mr. Willis, yeah.</p> <p>11 Q Do you know whether they worked for the MDOC or</p> <p>12 whether they were with another agency? If you know.</p> <p>13 A I don't know.</p> <p>14 Q Okay. After the deposition today you're going to get</p> <p>15 some form of a picture ID to your counsel, your</p> <p>16 attorney, so he can get it to us?</p> <p>17 A Yeah. I'll do my best.</p> <p>18 Q Okay. When you said your attorney had been trying to</p> <p>19 help you get a state ID, were you talking about this</p> <p>20 attorney or another --</p> <p>21 A Yeah. He took me to the Secretary of State one time</p> <p>22 but I didn't have enough documents to get it.</p> <p>23 Q Mr. Cross did?</p> <p>24 A Yeah. Him himself.</p> <p>25 MR. SCARBER: Mr. Jackson, I want to</p>
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<p>1 would have --</p> <p>2 A Yes.</p> <p>3 Q -- encountered you or remembered you or you dealt</p> <p>4 with?</p> <p>5 A Uh-huh. Yes, sir.</p> <p>6 Q Who?</p> <p>7 A I have to think. Give me one second. Willis.</p> <p>8 Q That's the last name or first name?</p> <p>9 A That's the last name. He was my counselor that I went</p> <p>10 to and talked to to try to get moved before I got into</p> <p>11 the fight with my bunkie to let him know that I was,</p> <p>12 you know, having a lot of trouble and issues because</p> <p>13 of my bag.</p> <p>14 Q Okay. So that would have been in or around January of</p> <p>15 2018, maybe end of '17?</p> <p>16 A Uh-huh.</p> <p>17 Q Okay. Who else?</p> <p>18 A Yep. It was another that -- I remember her name was</p> <p>19 Miss Wilson.</p> <p>20 Q And what facility was she at?</p> <p>21 A St. Louis. There was another -- Mr. Richardson. I</p> <p>22 used to always go to him and he helped me with extra</p> <p>23 supplies as far as, like, toilet paper and tissue, and</p> <p>24 he knew everything I was going through, like, you</p> <p>25 know, with other guys and the things I was going</p>	<p>1 thank you for your time today.</p> <p>2 THE WITNESS: Thank you.</p> <p>3 MR. SCARBER: I don't have anything</p> <p>4 further for you.</p> <p>5 I don't think we need to mark his answers</p> <p>6 to it, but you agree with me that these answers are</p> <p>7 signed and dated. They're 19 pages long and they have</p> <p>8 a date at the bottom of them of when they were served</p> <p>9 as being November the 9th of 2020. Do you agree with</p> <p>10 that?</p> <p>11 THE WITNESS: Yes, sir.</p> <p>12 MR. SCARBER: Okay. I don't have</p> <p>13 anything else.</p> <p>14 MR. CROSS: (Inaudible).</p> <p>15 COURT REPORTER: Are we off the record?</p> <p>16 MR. CROSS: No, we're not.</p> <p>17 COURT REPORTER: I'm sorry. I couldn't</p> <p>18 hear you.</p> <p>19 MR. CROSS: I'm sorry.</p> <p>20 - - -</p> <p>21 RE-EXAMINATION</p> <p>22 BY MR. CROSS:</p> <p>23 Q You were asked about grievances, Mr. Jackson. Are you</p> <p>24 familiar with the grievance procedure at MDOC?</p> <p>25 A Yes, sir.</p>

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<p style="text-align: right;">Page 245</p> <p>1 Q Can you describe the grievance procedure for us?</p> <p>2 A The grievance procedure is Step 1 grievance. You</p> <p>3 write the grievance and then they gave you the</p> <p>4 response to the grievance. If there is not a response</p> <p>5 to the grievance that you feel like you deserved, then</p> <p>6 you write another Step 2 grievance. You write a Step</p> <p>7 2 grievance and then they give you a response. If</p> <p>8 it's not the response that you feel you deserved, you</p> <p>9 write a Step 3 grievance. After the Step 3 grievance,</p> <p>10 if they don't give you the answer you feel you</p> <p>11 deserve, then I believe you appeal it.</p> <p>12 Q You think you can appeal it after the Step 3</p> <p>13 grievance?</p> <p>14 A It's been a while but I think you appeal it or</p> <p>15 something. You appeal it at one point in time. You</p> <p>16 appeal something.</p> <p>17 Q Do you know if you're allowed to grieve the same issue</p> <p>18 you've already grieved?</p> <p>19 A Yes.</p> <p>20 Q You are?</p> <p>21 A That's what it is about -- oh, no, you can't grieve</p> <p>22 that issue again. If you got denied at Step 3, then</p> <p>23 you have to appeal the whole grievance. That's what I</p> <p>24 believe. Don't quote me. But as far as I can</p> <p>25 remember. But I know for sure if you got denied the</p>	<p style="text-align: right;">Page 247</p> <p>1 A No, it's not.</p> <p>2 BY MR. CROSS:</p> <p>3 Q So were there any procedural steps you could have</p> <p>4 taken that you knew of that you did not take to</p> <p>5 further contest the denial of the surgery?</p> <p>6 A No. I followed all the procedures that I was aware of</p> <p>7 that I could take. Every single one. Filed Step 1,</p> <p>8 2, 3 grievance. I wrote the ombudsman and then I</p> <p>9 filed a formal complaint when I was released. Meaning</p> <p>10 the lawsuit or whatever that I filed with you. Right?</p> <p>11 MR. CROSS: Okay. I don't have any</p> <p>12 further questions.</p> <p>13 - - -</p> <p>14 RE-EXAMINATION</p> <p>15 BY MR. SCARBER:</p> <p>16 Q Mr. Jackson, you indicated that after Step 3 you could</p> <p>17 do an appeal; correct?</p> <p>18 A I said don't quote me. As far as I can remember. But</p> <p>19 I'm not sure.</p> <p>20 Q Okay.</p> <p>21 A You know what I'm saying? That's something that I'm</p> <p>22 thinking I remember but I'm not sure. It's been a</p> <p>23 while since I had to deal with this stuff.</p> <p>24 MR. SCARBER: Okay. I don't have</p> <p>25 anything further.</p>
<p style="text-align: right;">Page 246</p> <p>1 Step 3 grievance, it's over until you get an appeal.</p> <p>2 You can't send in another grievance because it's</p> <p>3 already been denied. Like, it's another Step 1</p> <p>4 grievance. You can't send that in. It's already been</p> <p>5 denied.</p> <p>6 Q Now, you wrote the legislative corrections ombudsman;</p> <p>7 is that correct?</p> <p>8 A Yes, sir.</p> <p>9 Q Is that outside the grievance process?</p> <p>10 A Yes, sir.</p> <p>11 Q Do you know when you did that?</p> <p>12 A I believe that was in Jackson when I first got to</p> <p>13 prison.</p> <p>14 Q Okay. Was there a procedure besides the three-step</p> <p>15 grievance procedure by which you could appeal the</p> <p>16 denial of your request for the surgery?</p> <p>17 MR. SCARBER: I'm just going to place an</p> <p>18 objection. Asked and answered.</p> <p>19 A Could you rephrase the question again?</p> <p>20 BY MR. CROSS:</p> <p>21 Q Is there another procedure besides the three-step</p> <p>22 grievance procedure we just discussed by which you</p> <p>23 could appeal the denial of your surgery?</p> <p>24 A No.</p> <p>25 MR. SCARBER: Same objection.</p>	<p style="text-align: right;">Page 248</p> <p>1 - - -</p> <p>2 RE-EXAMINATION</p> <p>3 BY MR. WILLIS:</p> <p>4 Q Mr. Jackson, you were asked some questions about</p> <p>5 grievance procedures. Do you know what the grievance</p> <p>6 procedure was at the St. Clair County Jail?</p> <p>7 A No.</p> <p>8 Q Or the appeals process?</p> <p>9 A No. See, that was the thing about that. I asked for</p> <p>10 a grievance. That's what I'm about to tell you. I'm</p> <p>11 answering your question. I asked them guys for a</p> <p>12 grievance and they told me and wrote in the kite. It</p> <p>13 should be in the records that they would not give me a</p> <p>14 grievance. All grievances are done on the tablet.</p> <p>15 Q Who?</p> <p>16 A Look at my own -- in the response.</p> <p>17 Q Was it the deputies?</p> <p>18 A It was somebody. I can't remember. But I know that's</p> <p>19 what was said to me, that they don't got paper</p> <p>20 grievance. Can't write a paper grievance. All</p> <p>21 grievances are done on the tablet. So that's what I</p> <p>22 did -- made a grievance on the tablet.</p> <p>23 Q Okay. So what did you do? Whatever the process was,</p> <p>24 you didn't do it; correct?</p> <p>25 A No. I did it. Whatever the process was I was</p>



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<p style="text-align: right;">Page 249</p> <p>1 supposed to do, I did.</p> <p>2 Q What did you do?</p> <p>3 A I wrote a grievance on the tablet like they told me.</p> <p>4 Q When?</p> <p>5 A When I was in the county jail.</p> <p>6 Q What did you say in your grievance?</p> <p>7 A I'd have to look at the grievance to tell you.</p> <p>8 Q Have you seen these records at your attorney's office?</p> <p>9 A I haven't seen any records about the St. Clair County</p> <p>10 Jail. I haven't seen them.</p> <p>11 Q Did you get a response to your grievance?</p> <p>12 A Can't remember. This was so long ago. I don't want</p> <p>13 to tell you I did.</p> <p>14 Q So you don't know if you did or you didn't?</p> <p>15 A I can't remember if I did or didn't.</p> <p>16 Q When did you file a grievance or an appeal at the</p> <p>17 county jail after you were told that you weren't going</p> <p>18 to have the surgery right away?</p> <p>19 A When I filed a grievance? You mean on the tablet?</p> <p>20 Q Yes.</p> <p>21 A I can't tell you exactly, sir. It's been a long time,</p> <p>22 but I'm sure I did.</p> <p>23 Q When?</p> <p>24 A I can't tell you, sir. I don't remember. It's been</p> <p>25 years. Sorry. I can't tell you, like, the month or</p>	<p style="text-align: right;">Page 251</p> <p>1 Q You kept that information?</p> <p>2 A Yes, I did. I have to find it.</p> <p>3 Q Did you give it to your lawyers?</p> <p>4 A I'm not sure what I did with it. I have to find it.</p> <p>5 Q Well, I ask -- I'm sure that our deposition notice</p> <p>6 requested that you bring any of that information.</p> <p>7 A So what? Do you want me to take a break and look to</p> <p>8 see if I could find it? Because that's not a problem.</p> <p>9 Q What did you bring with you that you can look while on</p> <p>10 a break?</p> <p>11 A Everything is on computer. I can't look at nothing</p> <p>12 because everything is on the computer. I have to</p> <p>13 break and go through it.</p> <p>14 Q Whose computer?</p> <p>15 A The computer I'm with, it's, like -- the computer I've</p> <p>16 been looking at, it's on the phone and on the</p> <p>17 computer.</p> <p>18 Q What's on your phone?</p> <p>19 A Everything that we're talking about.</p> <p>20 Q You've got a copy of the grievance on there?</p> <p>21 A No. Yeah, I should. All my records is on here, so,</p> <p>22 yeah, it should be on here. I have to look and see.</p> <p>23 MR. CROSS: Can I just help out here?</p> <p>24 The grievances that he made on the tablet are in the</p> <p>25 records that one of you guys provided to us -- the St.</p>
<p style="text-align: right;">Page 250</p> <p>1 the date because I don't remember. Like, you ask me</p> <p>2 the question but I have to tell you a month or a date</p> <p>3 and I don't actually remember a month or a date.</p> <p>4 Q Was it after the first time you were told that you</p> <p>5 were going to have the surgery right away or the</p> <p>6 second time or --</p> <p>7 A Can't remember which time but I know I did.</p> <p>8 Q Was it in January?</p> <p>9 A Can't remember but I know I did.</p> <p>10 Q You ever see a copy of it?</p> <p>11 A I can't remember but I know I did. This was years ago</p> <p>12 we talking about. This wasn't, like, last year</p> <p>13 and this wasn't last week. Like, you know what I</p> <p>14 mean?</p> <p>15 Q How do you know you did it if you haven't seen it?</p> <p>16 A Because I for sure remember that I did it. Because</p> <p>17 that's why I did it, because I was looking for a</p> <p>18 grievance and they wouldn't give me the paperwork and</p> <p>19 they told me all grievances was done on the tablet.</p> <p>20 Not only did I do it on the tablet, I wrote down the</p> <p>21 numbers and kept a log of all the numbers of the</p> <p>22 tablet grievances. Like, it would be grievance number</p> <p>23 00000. You know what I'm saying?</p> <p>24 Q Where did you write it down at and did you keep that?</p> <p>25 A I have to find that. Yes.</p>	<p style="text-align: right;">Page 252</p> <p>1 Clair County jail records. It's in the records. And</p> <p>2 some of the grievances I believe we attached to the</p> <p>3 Complaint.</p> <p>4 MR. WILLIS: Okay.</p> <p>5 BY MR. WILLIS:</p> <p>6 Q Is it your testimony that your grievance or your</p> <p>7 appeal was denied?</p> <p>8 A Grievance or appeal was denied? Which one?</p> <p>9 Q Either one. A grievance is a form of an appeal.</p> <p>10 A What grievance are you talking about? The grievance I</p> <p>11 filed in prison? The grievance I filed in jail? What</p> <p>12 grievance are you talking about?</p> <p>13 Q I'm asking you about the stuff in the St. Clair County</p> <p>14 Jail.</p> <p>15 A I actually don't even remember getting a response.</p> <p>16 Q Who did you send the grievance to?</p> <p>17 A Who I was supposed to have to send it to at that time.</p> <p>18 Can't remember because I know I sent it to the right</p> <p>19 person because I found out who I was supposed to send</p> <p>20 it before I sent it.</p> <p>21 MR. WILLIS: Can we take a break and take</p> <p>22 a look and see if we can find any grievances?</p> <p>23 THE WITNESS: From St. Clair County.</p> <p>24 MR. WILLIS: From St. Clair County.</p> <p>25 THE WITNESS: Yes, sir.</p>

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<p style="text-align: right;">Page 253</p> <p>1 VIDEOGRAPHER: We're going off the 2 record. It's 6:25 p.m. 3 (Whereupon, a recess was held.) 4 - - - 5 VIDEOGRAPHER: We are back on the record. 6 It is 6:32 p.m. 7 MR. WILLIS: Everybody ready? 8 MR. CROSS: Yeah. 9 MR. WILLIS: Thank you. We were -- just 10 took a brief break and looked at some grievances, and 11 plaintiff's counsel pointed out two grievances, one 12 for February 7, 2017 that went to Lieutenant Adams, 13 another on March 18, 2017 that went to Sergeant 14 Lebeau. 15 BY MR. WILLIS: 16 Q I guess my question is, sir, did you ever fill out a 17 medical grievance? 18 A A medical grievance? These are the only grievances 19 that they offered us, on the tablet. 20 Q That's not my question. Did you ever file a medical 21 grievance? 22 A These are the only grievances that they offered us. 23 They were on the tablet. Where do you -- 24 Q These are the ones that you wrote; right? 25 A Where do you see medical grievance? We were not</p>	<p style="text-align: right;">Page 255</p> <p>1 BY MR. SCARBER: 2 Q Mr. Jackson, while you were in the Department of 3 Corrections, you were able to eat also; correct? 4 A Yeah, I ate at jail. 5 Q And -- 6 A In prison, yes. 7 Q So we talked about working out. We talked about 8 eating. We talked about walking. We talked about 9 your ability to be able to care for your colostomy. 10 You were trained on how to do it. Were there any 11 other activities that you engaged in that I have not 12 mentioned? 13 A Well, eating was a problem at times. I would get sick 14 and nauseous when I would smell that bag. I vomited 15 sometimes. Like, the smell was not, like, 16 you-going-to-the-bathroom smell. It was like a 17 different total smell. 18 Q Let me ask you this. My question is, are there any 19 other activities that you did in jail other than what 20 we've discussed with respect to eating, walking, 21 working out? 22 A Going to school. 23 Q You went to school? 24 A Yeah. Can I tell you about that? 25 Q I'm not asking any questions about that.</p>
<p style="text-align: right;">Page 254</p> <p>1 available to give medical grievances because I 2 would've filled one out. 3 Q Just answer the question. Are these the only two 4 grievances that you filed in the St. Clair County 5 Jail, these two that were identified by your attorney? 6 A No. There's more than two. What do you mean? 7 There's one, two, three, four, five. You mean are 8 these the only five grievances? That's what you 9 asking me? Because it's not two. Where you get two? 10 It's five. 11 Q I'm not sure -- first of all, I'm not sure what you're 12 holding. Your attorney identified two grievances. 13 A But it's more than two grievances. 14 Q Where do they say grievances on -- are they identified 15 as grievances? 16 A Request -- ain't nothing identified as grievances, to 17 be honest with you. Everything is identified as 18 detail of request. But this about me making 19 continuous complaints. 20 MR. WILLIS: All right. Well, that's all 21 the questions I have. Thank you. 22 VIDEOGRAPHER: Are we done? 23 MR. WILLIS: I'm done. 24 - - - 25 RE-EXAMINATION</p>	<p style="text-align: right;">Page 256</p> <p>1 A Okay. 2 Q But you did go to school? 3 A Uh-huh. 4 MR. SCARBER: Okay. I think I'm 5 finished. I don't have anything further for you. 6 THE WITNESS: Okay. Thank you. 7 MR. SCARBER: Thank you. 8 VIDEOGRAPHER: Is that -- are we done? 9 MR. CROSS: I think we're done. 10 MR. WILLIS: I think we're done. 11 VIDEOGRAPHER: This concludes the 12 deposition. It is 6:36 p.m. We are off the record. 13 - - - 14 15 16 17 18 19 20 21 22 23 24 25</p>

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6 DECLARATION OF PENALTY OF PERJURY

7

8

9 I, \_\_\_\_\_, do hereby declare under

10 penalty of perjury that I have read the foregoing

11 transcript; that I have made any corrections as

12 appear noted, in ink, initialed by me, or attached

13 hereto; that my testimony as contained herein, as

14 corrected, is true and correct.

15 EXECUTED this \_\_\_\_\_ day of \_\_\_\_\_,

16 20\_\_\_\_\_, at \_\_\_\_\_, \_\_\_\_\_.

(City) (State)

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19 \_\_\_\_\_

20 KOHCHISE JACKSON

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25	Deponent's Signature _____			Date _____

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1 DEPONENT'S CHANGES OR CORRECTIONS

2 Note: If you are adding to your testimony, print

3 the exact words you want to add. If you are deleting

4 from your testimony, print the exact words you want

5 to delete. Specify with "Add" or "Delete" and sign

6 this form.

7

8 DEPOSITION OF: KOHCHISE JACKSON

9 CASE: JACKSON V. CORIZON HEALTH, INC.

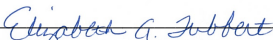
10 DATE OF DEPOSITION: MARCH 22, 2021

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25 Deponent's Signature _____	Date _____		

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1 CERTIFICATE OF NOTARY PUBLIC  
2 STATE OF MICHIGAN )  
3 ) SS.  
4 COUNTY OF OAKLAND )  
5  
6 I, Elizabeth A. Tubbert, do hereby certify that the  
7 witness whose attached testimony was taken before me in the  
8 above-entitled matter, was by me first duly sworn to testify  
9 to the truth, the whole truth; that the testimony contained  
10 herein was by me reduced to writing in the presence of the  
11 witness by means of stenography; afterward transcribed; and  
12 that this is the true and complete transcript of the  
13 testimony given by the witness.  
14  
15 I further certify I am not connected by blood or  
16 marriage with any of the parties, their attorneys or agents;  
17 and that I am not interested, directly or indirectly, in the  
18 matter of controversy.  
19  
20 IN WITNESS WHEREOF, I have hereunto set my hand and  
21 affixed my notarial seal.  
22  
23  
24  
25

  
Elizabeth A. Tubbert, CSR-4248  
Notary Public, Oakland County, Michigan  
My Commission Expires: October 25, 2023

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